

1 Ray E. Gallo (SBN 158903)  
2 [rgallo@gallo-law.com](mailto:rgallo@gallo-law.com)  
3 Dominic R. Valerian (SBN 240001)  
4 [dvalerian@gallo-law.com](mailto:dvalerian@gallo-law.com)  
5 Warren Stramiello (Admitted in NY; *Pro Hac Vice* application to be filed)  
6 [wstramiello@gallo-law.com](mailto:wstramiello@gallo-law.com)  
7 **GALLO LLP**  
8 1299 Fourth Street, Suite 505  
9 San Rafael, CA 94901  
10 Phone: 415.257.8800  
11  
12 Attorneys for Plaintiffs

13 UNITED STATES DISTRICT COURT  
14  
15 NORTHERN DISTRICT OF CALIFORNIA  
16  
17 SAN JOSE DIVISION  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Ryan Corley, William Dormann, Shannon  
Mehaffey, Kenneth Abeyratne, Lucas  
Acosta, Liban Aden, Moshe Admon, Javier  
Aguirre, Nadia Aissi, Aisana Aitzhanova,  
Charlee Akina, Callum Aldred, John  
Alexander, Benjamin Algeo, Bryce Allen,  
Caroline Alrman, Adam Alsabery, Vienna  
Alvarez, William Alverson, Andy  
Ambrose, Luke Anderson, Sean Antonacci,  
Brandon Arachikavitz, Scott Arellano,  
Omeed Atefi, Talia Avisar, Martha  
Avtandilian, Noah Baily, Jared Baker, Matt  
Baker, Daniel Balsam, Jason Balsamo,  
Laura Barajas, Kenia Barba, Mark Barbosa,  
Cory Barclay, Christopher Barnard, Halley  
Barnett, David Baroody, Forrest Bashaw,  
Laura Bates, Melissa Bates, Mridul Batra,  
Lorna Battista, John Becker, Evan Beckner,  
Brett Bell, Ayla Benavides, Edward  
Benitez, Frank Benitez, Megan Bergeron,  
Patrick Bergerson, Rim Berhane, Robert  
Berry, Rhiannon Bezore, Matei Bivolaru,  
James Boggie, Eleanor Bohn, Myken  
Bomberger, Jesse Bonelli, Mariel Booth,  
Michaela Borges, Max Brawer, Patricio  
Brito, Daniel Brog, Grant Bronsdon, Laura  
Bronson, Jake Broser, Peter Broski,  
Barbara Brown, Cameron Brown, Noranda  
Brown, Mark Brunton, Jonica Buck, John  
Buell, Wrenn Bunker-Koesters, Ryan  
Burke, Adam Buxbaum, Janel Calinog,  
Francesca Campos, Katherine Cannon,

Case No. 5:16-cv-00473-LHK

**COMPLAINT FOR:**

1. Violations of the Electronic  
Communications Privacy Act, 18 U.S.C.  
§2510 *et seq.*

**DEMAND FOR JURY TRIAL**

Hon. Lucy H. Koh  
Courtroom 8

1 Veronica Cano Chavez, Lauren Carlton,  
 2 Christian Carrillo, Lauren Cason, Rachel  
 Castiglione, Brittany Castillo, Karen  
 3 Catlow, Samuel Cavazos, Alexander  
 Cerjan, Meagan Chamberlain, Brett  
 Chamberlin, Kevin Chaney, Brian Chang,  
 4 Thomas Chavez, Jonathan Chen, Randy  
 Cherland, Ritish Chhabra, Daniel Chiang,  
 5 Nina Chidichimo, Cody Childers, Sandra  
 Childress, James Chiocchio, Michael Choi,  
 6 Ref Chowdhury, Allen Chung, Chelsea  
 Clark, Jordan Colclasure, Lisette Cole,  
 7 Andrew Collins, Stephen Colon, Andrew  
 Colucci, Ethan Compton, Emily Connelly,  
 8 Julianne Conrad, Logan Cooper, Tiffany  
 Cooper, Heather Copps, Harrison Corbett,  
 9 Jeremy Cordeiro, Nicholas Corpuz, Eudald  
 Correig Fraga, Erica Cortez, Renata Costa,  
 10 Joshua Cottrell-Schloemer, Layton Cox,  
 Marlee Craker, Dax Crocker, Rory Crook,  
 11 Pierre Cuglievan, Stephen D'Addio, Mark  
 Dalgaard, Bret Dalldorf, Joseph  
 12 Danehower, Zachari Daquioag, Deborah  
 Davis, Eli Davis, Katrina Davis, Hillary  
 13 Dawsey, Joseph De Jonge, Paul De La  
 Torre, Brenda De Leon, Juliet Deamicis,  
 14 Tyler Deangelis, Michael Deck, Anthony  
 Del Cid, Danielle Delbert, Maxwell Denny,  
 15 Daniel Diaz, Lillian DiCarlo (formerly  
 Taylor), Jeremy Diehl, Amber Diluzio,  
 16 Brian Dinh, Vincent Dirienzo, Blake  
 Disiere, Alexander Dobranic, Edward  
 17 Dobyns, Aaron Doucett, Phillip Dove,  
 Octav Dragoi, Sean Draper, Chris Driscoll,  
 18 Aliah Drow, Krista Drummond, Kenneth  
 Duckworth, David Dulle, Julia Dunn,  
 19 Samuel Dunscombe, John Durbin, Michael  
 Easterby, Andrew Ecord, Bianca Edwards,  
 20 Daniel Elkus, Zina Ellis, Aunna Elrod,  
 Colton Emel, Justin Emery, Chase  
 21 Engelhardt, Jonathan Englehart, Ian Epps,  
 Michelle Erford, Mariah Erlick, Julie  
 22 Etheridge, Rachel Ett, Carl Evans, James  
 Everglade, Bryan Eyers, Holden Faber,  
 23 Kelsey Fahey, Roger Fairley, Sean  
 Fanning, Robert Farrar, Kelsey Farrell,  
 24 Anton Fedorov, Julia Feldman, James  
 Feng, Kristy Fenning, Daniel Fernandez,  
 25 Tova Ferstenberg, Jose Figueroa Delgado,  
 Zachary Finch, Matthew Fisherkeller,  
 26 Michael Flagg, Brandon Flannery, Cynthia  
 Flores, Kimberly Flores, Skylar Florian,  
 27 Ryan Flynn, Corinne Foley, John Forbes,  
 Alexandria Foster, Shannon Fouts, David  
 28 Frailey, Samuel Frank, Joel Frattini, Mark

1 Fredrickson, Mark Freeman, Matthew  
 2 Freifeld, Charles Fukai, Thaine Fuller,  
 3 Megan Gaebler, Brian Gamez, Mary  
 4 Garcia, Abigail Gardner, Kenneth Garges,  
 5 Daniel Gauthier, Nicole Gedert, Benjamin  
 6 Geilich, Paula Gelvez-Petrone, Michael  
 7 Geyer, Rajan Gill, James Gillooley, Jessica  
 8 Giusti, Jessica Golden, Alex Goldklang,  
 9 Matt Goldman, Joel Goldschlag, Leonardo  
 10 Gonzalez, Joseph Goodknight, Joseph  
 11 Gradias, Shari Gray, Andrew Grazioli,  
 12 Joseph Greenbaum, Rachel Greenbaum,  
 13 Robert Griego III, Peter Griffis, Catherine  
 14 Grizzell, Derek Grosshart, Michael  
 15 Guillory, Seth Guldin, Bishal Gupta, Samir  
 16 Gupta, Peter Gustafson, Carmen Gutierrez,  
 17 Jerrelle Guy, Acshi Haggenmiller, Jerome  
 18 Hale, Michael Hall, Nicholas Hall, Michael  
 19 Hallock, Mark Hamilton, Marina  
 20 Handwerk, Christine Hanna, Courtney  
 21 Hanson, Sawyer Hardie, Rebecca  
 22 Hassinger, Quinn Hatoff, Eric Haviland,  
 23 Miles Hearn, Lauren Hebert, Taylor  
 24 Heisley-Cook, Richard Heitmeyer, Devon  
 25 Henry, Nelson Hernandez, Austin Herry,  
 26 Noah Hersom, Jesse Hertz, Elin Hervall,  
 27 Mitchell Heschke, Gordon Hiland, Cory  
 28 Hill, Brandon Hodges, Hailey Hollers,  
 Mark Hollwedel, Demarie Holmes, Nia  
 Holston, Tyler Howell, Ellen Howes, Kai  
 Hoyt, Nicholas Hoyt, Sally Hu, Kensai  
 Hughes, Kayla Hutchings, Torri Igou,  
 Timothy Irvine, Jillian Jackson, Chris  
 Jacobson, Murtaza Jafferji, Yesenia  
 Jameson, Gustavo Jauregui, Maria  
 Jennings, Jasmeet Jernaill, Thomas Jobst,  
 Jr., Nina Johal, Joseph Johns, Karl  
 Johnson, Rosa Johnson, Ryan Johnson,  
 Aaron Jones, Crystal Joseph, Evan Kahn,  
 Michael Kaspark, Brandon Kassimir,  
 Archavanich Kawmongkolsi, Joseph  
 Kayaleh, Jesse Kelly, Aaron Kenny, Siri  
 Kirin Khalsa, Aaron Khansefid, B. Kim,  
 Dae Han Kim, Shawn Kim, Andrew King,  
 Ryan King, Royce Kirk, Carli Kitto,  
 Jessica Klix, Janice Knight, Justin  
 Kohlberg, Casey Kono, Alec Konstantin,  
 Maksim Korolev, Tarun Koshy, Kyle  
 Kovacs, Ryan Kreisberg, Alexandra Kurtz,  
 Brian Kurtz, Rhonda La Grande, Rosemary  
 La Grua, Antonio Lamv, Justas Lauzadis,  
 Nathan Lawson, Evan Layman, Cassandra  
 Leasure, Daniel Lecours, Bryan Leddy,  
 Jennifer Lee-Yuen, Joanne Lee-Yuen, Josh  
 Lehga, Adam Leotta, Benjamin Lesea-

1 Pringle, Martha Letchinger, Shannon  
 2 Levis, Daniel Lewis, Joseph Lewis, Erica  
 3 Leyva Arenas, Helen Li, Michael Li,  
 4 Chelsea Liebowitz, Anthony Lim, Danielle  
 5 Littman, David Liu, Joshua Liu, Athena  
 6 Lo, Sergey Lobatch, Daniel Lopez, David  
 7 Love, Signe Loving, Janet Lu, Eric Lujan,  
 8 Elias Luna, Xinjie Luo, Matthew Lusher,  
 9 Devin Lynch, Sean Lyness, Casimir  
 10 Lyszcarczyk, Benjamin Mabie, Steven  
 11 Mach, Carleigh Madden, Colin Madrid,  
 12 William Major, Hin Mak, Mihailo  
 13 Malowany, Henry Manes, Emily Martin,  
 14 Sean Martin, Paul Martino, Megan  
 15 Martucci, Derek Marx, Alexander Matzat,  
 16 Thomas Mccann, Amanda Mcclintock,  
 17 Charles Mcdonald, Asher Mcguffin,  
 18 Tracelyn Mcguire, Kevin Mckeown, Ryan  
 19 Mckeown, Joseph Mcmanus, Jean-luc  
 20 Mcmurtry, Taryn McPherson, Jason  
 21 McQuade, Tyler Meacham, William  
 22 Mebane, Alyssa Mehl, Ricardo Melgoza,  
 23 Kyle Mendenhall, Ignacio Mendez-Nunez,  
 24 Alvaro Mendizabal, Aaron Metviner, Todd  
 25 Michael, Ericka Michal, Amy Miller,  
 26 Joseph Miller, Winn Miller, Ryan Millman,  
 27 Amanda Mitchell, Nikki Modiri, Keyhan  
 28 Moini, Richard Mojica, Nicholas Mokover,  
 Matthew Molzahn, Aleesa Monaco, Edgar  
 Mondragon, Elizabeth Mooney, Cosme  
 Morga, Josue Morga, Stephen Morrison,  
 Kira Moser, Gregory Mozdyniewicz,  
 Matthew Mueller, Zachary Mullings,  
 Karthik Munugala, Victor Muratalla  
 Morales, Travis Murphy, Arjang Navab,  
 Alexander Nee, Spencer Neiman, Gary  
 Ngo, Andrew Nguyen, Dustin Niblett,  
 Nicole Niebrzydowski, Sarah Nikdel, Jae  
 Seong No, Conor O'Brien, David  
 O'Connell, Christian Ogren, Justin O'Hare,  
 Tim Okkema, Lauren Olney, Grant  
 Olscamp, Christine Ondris, Corey O'Neill,  
 Dillon Orr, Daniel Osorio, Zachary  
 Ouellette, Jordan Paddock, Jessica Paek,  
 Kevin Park, Marina Paske, Sara Paull,  
 Jared Paulo, Jasmine Pawlicki, Lindsay  
 Payne, Thomas Peres, Anthony Perrotta,  
 Dennis Peterson, Ethan Pezzolo, Kevin  
 Pham, Matthew Phillips, Alyssa Picard,  
 Kyle Picha, Charles Pickard, Nathanael  
 Pickslay, Irene Pinon, Kevin Pormir, Edgar  
 Portillo, Jesse Posehn, Brian Pybas,  
 Stephen Racca, Patricia Radis, Shae  
 Rafferty, Arielle Rahmanan, Laurel Rain,  
 Julie Rainey, Jacob Rakosi, Jay Ram, Steve

1 Ramirez, Norma Ramos, Joseph Rapier,  
 2 Dmitriy Rapoport, Debra Ray, Melanie  
 3 Redd, Jay Reddy, Christian Reed, Darlene  
 4 Reilley, Hannah Remis, Saila Reyes, Karen  
 5 Reynaga, Justin Rezende, Joshua Rhoades,  
 6 Colby Richards, Paul Richter, Voltario  
 7 Rico, Kellie Riggs, Eric Riley, Annelise  
 8 Ringelman, Ashley Rits, Sarah Rittenour,  
 9 Joseph Rivera, Michael Rivera, Derek  
 10 Robbins, Kathryn Robison, Donald  
 11 Rodriguez, Steven Rodriguez, John Rogers,  
 12 Ryan Romain, Benjamin Romero, Patrick  
 13 Rooney, Isaac Root, Sean Roper, Dara  
 14 Rosenkrantz, Shoshana Rosenthal, Sean  
 15 Ross, Benjamin Rowan, Christine  
 16 Rowland, Michael Roy, Evgenia Royter,  
 17 Patrick Rubio, Denise Rueda, Kurt Ruegg,  
 18 David Ruelas, Christopher Rutledge,  
 19 Danielle Ryder, Ardena Saarinen, Robert  
 20 Saeman, Lauren Saguilig, Wilfred Salas Jr.,  
 21 Nicholas Samokyszyn, Matthew Sample,  
 22 Jason Sanbei, Carissa Sanchez, Remy  
 23 Sarhan, Lina Sarusal, Ishita Saxena, Kevin  
 24 Saxman, Emily Schapka, Jake Scheps,  
 25 Christine Schmitt, Thomas Schmitt,  
 26 Congher Schomburg, Jack Schow, Thomas  
 27 Schulte, Geoff Schuyler, Daniel  
 28 Schwiebert, Myles Scolnick, Tyler Searls,  
 Stephanie Seibel, Luke Sellers, Matthew  
 Shaffer, Samir Shah, Tyler Sherer, David  
 Sherman, Monica Sherwood, Kevin Shih,  
 Reed Showalter, Daniel Shubat, Yevgeniy  
 Shuster, Brent Sievers, Erica Siu, David  
 Skarbowski, Brian Skillings, Matthew  
 Slovin, Joseph Smeeding, Andrew Smith,  
 Brittany Smith, Harrison Smith, Jordan  
 Smith, Morgan Smith, Richard Smith,  
 Sophia Smith, Justin Sola, Michael  
 Solotke, Lewis Solow-Collins, Miles Sorel,  
 Craig Sotebeer, Matt Sportini, Sean  
 Stalhandske, Zachary Stamplis, Jeff Stark,  
 Tomasz Stawicki, Holly Stehlin, Jeffrey  
 Stephens, Alexadner Stoffel, Richard  
 Stofle, Joshua Storms, Rory Strahan-Mauk,  
 Ryan Strauss, Gregory Stuck, Emilie  
 Stuebe, Tala Sullivan, Sebastian Swae-  
 Shampine, Ryan Swearingen, Cristina  
 Swift, Deborah Tackett, Rex Tai, Vanessa  
 Tait, Samuel Tall, Kristian Talley, Kevin  
 Tan, Tammy Tan, Ronald Tardiff, Meighan  
 Taylor, Brian Teed, Etienne Thach, Robert  
 Thomas, Kayla Thompson, Roy  
 Thompson, Wyatt Thurston, Robert  
 Thyberg, Steven Timlin, Joanna Titus,  
 Chezare Torres, Samuel Torres, Maria

1 Torruella Suarez, Katrina tosh, Cody  
 2 Trevillian, Andrew Trevino, Kailey-alyssa  
 3 Tucker, Melody Tuttle, Symeon Tzvetkov,  
 4 Kimberly Vadelnieks, Desiree Valadez,  
 5 Karina Valencia, Anthony Valente,  
 6 Jonathan Van Ness, Amber Vandever  
 7 (Schlecht), Tamara Varga, Polly Varize,  
 8 Zachary Vary, Diana Vega, Kriya Issa  
 9 Velasco, Samuel Velie, Quincy Venter,  
 10 Maia Ventura, Pedro Venzor, Sandeep  
 11 Verma, Omar Villa, Nikolay Vinogradov-  
 12 Nurenberg, James Volz, June Vutrano,  
 13 Maya Wagoner, Robert Wainblat,  
 14 Raymond Wang, Bradford Ward, Jessie  
 15 Watson, Angela Wayne, Amanda Weber,  
 16 Misty Weiner, Patrick Weinschreider,  
 17 Jaclyn Weinstein, Vivian Wenzler, James  
 18 Whalen, Chelsea Whitman, Thomas  
 19 Wicker, Nicholas Wiese, Anthony  
 Wiggins, Philip Wilkerson, Christopher  
 Wille, Nathaniel Williams, Conner Wilson,  
 Hannah Wilson, Stella Wilson-Frey, John  
 Wiltse, Saul Winer, Casey Wing, Jacob  
 Winkler, Nicholas Winter, Maxwell Witt,  
 Audrey Wittrup, Myles Woerner, Sam  
 Wolfe, Max Wolff, Nicole Wonderly,  
 Amanda Wong, Amanda Wood, Jessicah  
 Wood, Brendan Woodruff, Joshua Wright,  
 Samantha Wright, Selisa Wright, Jacob  
 Wunsh, Alexander Yaldo, Chuqiao Yang,  
 Camryn Yaros, Cynthia Yip, Alyssa  
 Young, Hope Young, Peter Young, Allyn  
 Yu, Gordon Yu, Christina Yun, Sierra  
 Zang, Cory Zapatka, Natasha Zaretsky,  
 Nicholas Zessis, Mo Zhang, Kevin Zhu,  
 Amy Zimmerman, Gregory Zoeller, and  
 Steven Zwick, individuals,

20 Plaintiffs,

21 v.

22 GOOGLE INC., and DOES 1 through  
 23 200,000

24 Defendant.

## 25 26 **1. Introduction**

27 1. Defendant Google Inc. ("Google") violated the privacy of students,  
 28 faculty, and staff of U.S. schools, including but not limited to the Plaintiffs in this action,

1 by intercepting and scanning the content of their Google Apps for Education (“GAFE”)  
2 emails, in transit, for Google’s own commercial purposes, and without those users’  
3 consent. Google’s commercial purposes at all relevant times included but were not  
4 limited to the profiling of individuals (both users and their email counterparties) for the  
5 purpose of serving targeted advertising to them, as well as other commercial purposes,  
6 both known and unknown (hereinafter, “Commercial Purposes”). Numerous additional  
7 claims like Plaintiffs’ are expected to follow in an amended version of this complaint  
8 and/or in related cases.

9           2. Google’s unauthorized interception of Plaintiffs’ email in that manner and  
10 for that purpose violated the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510  
11 *et seq.* (the “Privacy Act”). Plaintiffs used Google Apps for Education in connection with  
12 their affiliations with their below-identified educational institutions. They seek, without  
13 limitation: (1) injunctive relief in the form of, *inter alia*, an order requiring Google to  
14 purge from its records all information gathered from Plaintiffs’ messages intercepted in  
15 violation of the Privacy Act, including all derivative information; (2) a declaration that  
16 Google’s conduct violated the Privacy Act; (3) statutory damages under 18 U.S.C §2520  
17 of the greater of \$100 a day for each day of violation or \$10,000 for each Plaintiff; and  
18 (4) attorney’s fees and costs of litigation. The allegations herein that relate to Plaintiffs’  
19 personal actions are made based on their personal knowledge. The balance are made on  
20 information and belief based on the investigation of counsel.

## 21 **2. The Parties**

22           3. Plaintiffs are individuals residing collectively in the states of Alabama,  
23 Arizona, California, Colorado, Connecticut, Florida, Georgia, Hawaii, Idaho, Illinois,  
24 Indiana, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota,  
25 Montana, Nevada, New Hampshire, New Jersey, New York, North Carolina, Ohio,  
26 Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia,  
27 Washington, and Wisconsin as well as Washington D.C., Canada, Germany, Hong Kong,  
28



1 and Spain. Each is a current or former student, faculty member, or staff member who  
2 used a GAFE email account, during the relevant timeframe, in connection with studying  
3 or working at a U.S. college or university. The vast majority are or were students. Each  
4 Plaintiff's emails were intercepted by Google and scanned for Commercial Purposes  
5 without consent and, therefore, illegally.

6 4. Defendant Google is a United States corporation headquartered in  
7 Mountain View, California, and incorporated under the laws of Delaware.

8 5. Defendants DOES 1 through 200,000 are the principals, agents, partners,  
9 affiliates, officers, directors, shareholders, creditors, members, employees, managers,  
10 joint venturers, co-venturers, and/or co-conspirators, of their co-defendants and were  
11 acting within the course scope of their agency, agreement, duties, employment, or shared  
12 purpose in planning, effectuating, advancing, aiding, abetting, or committing the below-  
13 described wrongful acts.

### 14 **3. Jurisdiction and Venue**

15 6. Pursuant to 28 U.S.C. § 1331, this Court has original jurisdiction over the  
16 claims of Plaintiffs that arise under the Privacy Act.

17 7. This Court has personal jurisdiction over Google because Google owns  
18 and operates a business that is headquartered in California and conducts substantial  
19 business throughout California.

20 8. Venue lies in this district pursuant to 28 U.S.C. § 1391(b)(1) because  
21 Google is headquartered here.

### 22 **4. Intra-district Assignment**

23 9. Pursuant to Local Rule 3-2(c), assignment to the San Jose Division is  
24 proper because Google contracted to provide the services at issue in and from the County  
25 of San Clara, and because related litigation is and has been pending before that Division.  
26  
27  
28



1       **5. Statement of Facts**

2           10. Google Apps is a suite of integrated Google products or services that  
3 includes Google's web-based email service, Gmail. Google Apps for Education is a  
4 version of Google Apps that Google offers to universities and other educational  
5 institutions ("Educational Institutions") for use by their students, faculty, and staff  
6 ("Educational Users"). GAFE is free to Educational Users at the point of delivery.  
7 Educational Institutions contract with Google for the use of Google Apps for their  
8 faculty, staff, and students. Educational Users receive email accounts and addresses with  
9 names that reflect the users' Educational Institution affiliation, not an association with  
10 Google—e.g. jane.doe@berkeley.edu.

11           11. Like other companies that provide otherwise-costly software at a low or  
12 zero monetary charge to end users, Google receives substantial economic benefits from  
13 providing GAFE to Educational Users and Educational Institutions. For example,  
14 Google's brand benefits by increasing its recognition and goodwill among current and  
15 future potential customers (the students, staff, and faculty at the school). Google also  
16 increases its user base, resulting in significant network effects that drive further adoption  
17 of Google's products and broader acceptance of Google's user interface, formats,  
18 protocols, and APIs as *de facto* "standards," which creates a feedback loop that further  
19 increases the use of Google products.

20           12. From November 1, 2010 or earlier and until at least on or about April 30,  
21 2014 (the "Relevant Period"), Google also benefitted from providing GAFE to  
22 Educational Users by scanning and processing the content of every email received by or  
23 sent from a Google Apps for Education user account to develop sophisticated individual  
24 profiles for Commercial Purposes.

25           13. Plaintiffs each used GAFE email accounts provided by their respective  
26 Educational Institutions during the Relevant Period. Each Plaintiff received disclosures  
27 from his or her Educational Institution that indicated his or her GAFE emails were  
28 private. None of these disclosures notified him or her of Google's interception or content

1 scanning for Commercial Purposes. Many Plaintiffs received disclosures that assured  
2 them there would be no such scanning. No Plaintiff consented or intended to consent to  
3 Google's interception and scanning for Commercial Purposes. At all relevant times  
4 Plaintiffs and each of them were unaware of and had no reason to suspect Google's  
5 wrongful actions.

6 14. Plaintiffs and each of them first learned—and first had reason to learn  
7 of—Google's wrongdoing within the applicable statutory limitations period. Plaintiffs  
8 did not receive advertisements while using the GAFE web client (during the Relevant  
9 Period, Google was either not advertising to Educational Users through the GAFE web  
10 client and/or advertising was turned off in GAFE by their Educational Institution(s)) but  
11 the content of Plaintiffs' and all Educational Users' emails nevertheless was intercepted,  
12 extracted, analyzed, and used by Google to create user profiles and otherwise to enhance  
13 Google's marketing, advertising, and other business interests, including but not limited  
14 to serving targeted advertising to Plaintiffs and each of them, either then (through non-  
15 GAFE applications, such as Google's search engine) or in the future.

16 15. Google employed a variety of devices to intercept and acquire the content  
17 of all Educational Users' GAFE account emails, including Plaintiffs' emails. These  
18 devices included but were not limited to:

19 1) The Content Onebox—a distinct piece of Google's infrastructure,  
20 the purpose of which is to acquire, read, and interpret the content of in-transit email  
21 messages. Through this subsystem, during the relevant time period, Google not only  
22 collected the content of Educational Users' email but also created derivative data,  
23 including metadata, about and from that content.

24 2) Changeling—a distinct piece of Google's infrastructure that Google  
25 used to acquire, read, and interpret the contents of Educational Users' in-transit email.

26 16. Google's interception, scanning, and processing of Educational Users'  
27 email for Commercial Purposes was not a necessary or instrumental component of  
28

1 Google's operation of a functioning email system, nor was it an incidental effect of  
2 providing this service. Instead, Google's unauthorized actions were opportunistic and  
3 conducted to generate profit for Google's advertising business.

4 17. Each and every individual Plaintiff had a GAFE account and used it to  
5 send and receive email during the Relevant Period:

6 1) Plaintiff Ryan Corley resides in California, had a GAFE account  
7 through the University of California, Berkeley, and used it to send and receive email  
8 beginning in or about August 2012 and continuing through the end of April 2014 (when  
9 Google claims to have stopped intercepting, scanning, and processing GAFE email for  
10 Commercial Purposes) and thereafter;

11 2) Plaintiff William Dormann resides in California, had a GAFE  
12 account through the University of California, Berkeley, and used it to send and receive  
13 email beginning in or about August 2013 and continuing through the end of April 2014  
14 and thereafter;

15 3) Plaintiff Shannon Mehaffey resides in California, had a GAFE  
16 account through the University of California, Berkeley, and used it to send and receive  
17 email beginning in or about April 2013 and continuing through the end of April 2014 and  
18 thereafter.

19 4) Plaintiff Kenneth Abeyratne resides in New York, had a GAFE  
20 account through New York University, and used it to send and receive email starting in or  
21 about May 2011 and continuing through May 2013.

22 5) Plaintiff Lucas Acosta resides in Connecticut, had a GAFE account  
23 through New York University, and used it to send and receive email starting in or about  
24 August 2013 and continuing through the end of April 2014 and thereafter.

25 6) Plaintiff Liban Aden resides in Massachusetts, had a GAFE account  
26 through Brandeis University, and used it to send and receive email starting in or about  
27 August 2012 and continuing through the end of April 2014 and thereafter.  
28

1                   7)       Plaintiff Moshe Admon resides in Arizona, had a GAFE account  
2 through the University of Arkansas, and used it to send and receive email starting in or  
3 about September 2013 and continuing through the end of April 2014 and thereafter.

4                   8)       Plaintiff Javier Aguirre resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about November 2011 and continuing through the end of April 2014 and  
7 thereafter.

8                   9)       Plaintiff Nadia Aissi resides in New York, had a GAFE account  
9 through the State University of New York at Stony Brook, and used it to send and receive  
10 email starting in or about May 2013 and continuing through the end of April 2014 and  
11 thereafter.

12                  10)       Plaintiff Aisana Aitzhanova resides in Arizona, had a GAFE  
13 account through Boston University, and used it to send and receive email starting in or  
14 about September 2011 and continuing through the end of April 2014 and thereafter.

15                  11)       Plaintiff Charlee Akina resides in Hawaii, had a GAFE account  
16 through the University of Hawaii, and used it to send and receive email starting in or  
17 about December 2011 and continuing through the end of April 2014 and thereafter.

18                  12)       Plaintiff Callum Aldred resides in Michigan, had a GAFE account  
19 through the University of Michigan, and used it to send and receive email starting in or  
20 about September 2013 and continuing through the end of April 2014 and thereafter.

21                  13)       Plaintiff John Alexander resides in Michigan, had a GAFE account  
22 through the Michigan Technological University, and used it to send and receive email  
23 starting in or about March 2012 and continuing through the end of April 2014 and  
24 thereafter.

25                  14)       Plaintiff Benjamin Algeo resides in Maine, had a GAFE account  
26 through the University of Maine, and used it to send and receive email starting in or about  
27 September 2010 and continuing through the end of April 2014 and thereafter.  
28

1                   15) Plaintiff Bryce Allen resides in Florida, had a GAFE account  
2 through Virginia Tech, and used it to send and receive email starting in or about  
3 December 2012 and continuing through the end of April 2014 and thereafter.

4                   16) Plaintiff Caroline Alrman resides in Maine, had a GAFE account  
5 through New York University, and used it to send and receive email starting in or about  
6 May 2011 and continuing through the end of April 2014 and thereafter.

7                   17) Plaintiff Adam Alsabery resides in Washington, had a GAFE  
8 account through the University of California, Santa Cruz, and used it to send and receive  
9 email starting in or about November 2011 and continuing through March 2014.

10                  18) Plaintiff Vienna Alvarez resides in California, had a GAFE account  
11 through the University of California, Santa Cruz, and used it to send and receive email  
12 starting in or about September 2012 and continuing through the end of April 2014 and  
13 thereafter.

14                  19) Plaintiff William Alverson resides in Virginia, had a GAFE account  
15 through the University of Michigan, and used it to send and receive email starting in or  
16 about October 2012 and continuing through the end of April 2014 and thereafter.

17                  20) Plaintiff Andy Ambrose resides in Arizona, had a GAFE account  
18 through the University of Arizona, and used it to send and receive email starting in or  
19 about August 2013 and continuing through the end of April 2014 and thereafter.

20                  21) Plaintiff Luke Anderson resides in Michigan, had a GAFE account  
21 through the University of Michigan, and used it to send and receive email starting in or  
22 about October 2012 and continuing through the end of April 2014 and thereafter.

23                  22) Plaintiff Sean Antonacci resides in California, had a GAFE account  
24 through the University of California, Santa Cruz, and used it to send and receive email  
25 starting in or about October 2012 and continuing through the end of April 2014 and  
26 thereafter.

1                   23) Plaintiff Brandon Arachikavitz resides in Illinois, had a GAFE  
2 account through the Michigan Technological University, and used it to send and receive  
3 email starting in or about September 2012 and continuing through May 2013.

4                   24) Plaintiff Scott Arellano resides in Arizona, had a GAFE account  
5 through the University of Arizona, and used it to send and receive email starting in or  
6 about September 2010 and continuing through the end of April 2014 and thereafter.

7                   25) Plaintiff Omeed Atefi resides in California, had a GAFE account  
8 through the University of California, Santa Cruz, and used it to send and receive email  
9 starting in or about November 2011 and continuing through the end of April 2014 and  
10 thereafter.

11                   26) Plaintiff Talia Avisar resides in California, had a GAFE account  
12 through the University of California, Santa Cruz, and used it to send and receive email  
13 starting in or about September 2012 and continuing through the end of April 2014 and  
14 thereafter.

15                   27) Plaintiff Martha Avtandilian resides in California, had a GAFE  
16 account through the University of California, Berkeley, and used it to send and receive  
17 email starting in or about November 2012 and continuing through May 2013.

18                   28) Plaintiff Noah Baily resides in Connecticut, had a GAFE account  
19 through Yale University, and used it to send and receive email starting in or about July  
20 2013 and continuing through the end of April 2014 and thereafter.

21                   29) Plaintiff Jared Baker resides in California, had a GAFE account  
22 through the University of California, Berkeley, and used it to send and receive email  
23 starting in or about September 2013 and continuing through the end of April 2014 and  
24 thereafter.

25                   30) Plaintiff Matt Baker resides in Oregon, had a GAFE account  
26 through Pacific Lutheran University, and used it to send and receive email starting in or  
27 about September 2011 and continuing through the end of April 2014 and thereafter.  
28

1                   31) Plaintiff Daniel Balsam resides in California, had a GAFE account  
2 through New York University, and used it to send and receive email starting in or about  
3 May 2011 and continuing through the end of April 2014 and thereafter.

4                   32) Plaintiff Jason Balsamo resides in New York, had a GAFE account  
5 through Boston University, and used it to send and receive email starting in or about  
6 September 2011 and continuing through the end of April 2014 and thereafter.

7                   33) Plaintiff Laura Barajas resides in Arizona, had a GAFE account  
8 through the University of Arizona, and used it to send and receive email starting in or  
9 about January 2010 and continuing through the end of April 2014 and thereafter.

10                  34) Plaintiff Kenia Barba resides in California, had a GAFE account  
11 through the University of California, Santa Cruz, and used it to send and receive email  
12 starting in or about September 2013 and continuing through the end of April 2014 and  
13 thereafter.

14                  35) Plaintiff Mark Barbosa resides in California, had a GAFE account  
15 through the University of California, Santa Cruz, and used it to send and receive email  
16 starting in or about November 2011 and continuing through the end of April 2014 and  
17 thereafter.

18                  36) Plaintiff Cory Barclay resides in California, had a GAFE account  
19 through the University of California, Santa Cruz, and used it to send and receive email  
20 starting in or about November 2011 and continuing through March 2013.

21                  37) Plaintiff Christopher Barnard resides in California, had a GAFE  
22 account through the University of California, Santa Cruz, and used it to send and receive  
23 email starting in or about November 2011 and continuing through the end of April 2014  
24 and thereafter.

25                  38) Plaintiff Halley Barnett resides in Washington, had a GAFE  
26 account through Pacific Lutheran University, and used it to send and receive email  
27  
28



1 starting in or about September 2013 and continuing through the end of April 2014 and  
2 thereafter.

3 39) Plaintiff David Baroody resides in Massachusetts, had a GAFE  
4 account through Boston University, and used it to send and receive email starting in or  
5 about September 2011 and continuing through May 2012.

6 40) Plaintiff Forrest Bashaw resides in California, had a GAFE account  
7 through the University of California, Santa Cruz, and used it to send and receive email  
8 starting in or about November 2011 and continuing through January 2014.

9 41) Plaintiff Laura Bates resides in California, had a GAFE account  
10 through the University of California, Santa Cruz, and used it to send and receive email  
11 starting in or about March 2014 and continuing through the end of April 2014 and  
12 thereafter.

13 42) Plaintiff Melissa Bates resides in California, had a GAFE account  
14 through the University of California, Santa Cruz, and used it to send and receive email  
15 starting in or about November 2011 and continuing through the end of April 2014 and  
16 thereafter.

17 43) Plaintiff Mridul Batra resides in Illinois, had a GAFE account  
18 through Harvard University, and used it to send and receive email starting in or about May  
19 2013 and continuing through the end of April 2014 and thereafter.

20 44) Plaintiff Lorna Battista resides in Arizona, had a GAFE account  
21 through the University of Arizona, and used it to send and receive email starting in or  
22 about January 2010 and continuing through the end of April 2014 and thereafter.

23 45) Plaintiff John Becker resides in Illinois, had a GAFE account  
24 through Northwestern University, and used it to send and receive email starting in or  
25 about September 2011 and continuing through the end of April 2014 and thereafter.  
26  
27  
28

1                   46) Plaintiff Evan Beckner resides in Michigan, had a GAFE account  
2 through the Michigan Technological University, and used it to send and receive email  
3 starting in or about March 2012 and continuing through May 2013.

4                   47) Plaintiff Brett Bell resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about November 2011 and continuing through December 2012.

7                   48) Plaintiff Ayla Benavides resides in California, had a GAFE account  
8 through the University of California, Berkeley, and used it to send and receive email  
9 starting in or about November 2012 and continuing through the end of April 2014 and  
10 thereafter.

11                   49) Plaintiff Edward Benitez resides in Arizona, had a GAFE account  
12 through the University of Arizona, and used it to send and receive email starting in or  
13 about August 2012 and continuing through the end of April 2014 and thereafter.

14                   50) Plaintiff Frank Benitez resides in California, had a GAFE account  
15 through the University of California, Santa Cruz, and used it to send and receive email  
16 starting in or about November 2011 and continuing through July 2013.

17                   51) Plaintiff Megan Bergeron resides in Massachusetts, had a GAFE  
18 account through Northwestern University, and used it to send and receive email starting in  
19 or about June 2011 and continuing through the end of April 2014 and thereafter.

20                   52) Plaintiff Patrick Bergerson resides in Massachusetts, had a GAFE  
21 account through Boston University, and used it to send and receive email starting in or  
22 about September 2011 and continuing through September 2012.

23                   53) Plaintiff Rim Berhane resides in California, had a GAFE account  
24 through the University of California, Berkeley, and used it to send and receive email  
25 starting in or about November 2012 and continuing through the end of April 2014 and  
26 thereafter.

1                   54) Plaintiff Robert Berry resides in Arizona, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about August 2010 and continuing through the end of April 2014 and thereafter.

4                   55) Plaintiff Rhiannon Bezore resides in Canada, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about November 2011 and continuing through January 2014.

7                   56) Plaintiff Matei Bivolaru resides in New York, had a GAFE account  
8 through New York University, and used it to send and receive email starting in or about  
9 September 2012 and continuing through the end of April 2014 and thereafter.

10                  57) Plaintiff James Boggie resides in Massachusetts, had a GAFE  
11 account through Boston University, and used it to send and receive email starting in or  
12 about September 2011 and continuing through May 2012.

13                  58) Plaintiff Eleanor Bohn resides in Rhode Island, had a GAFE  
14 account through Brown University, and used it to send and receive email starting in or  
15 about August 2013 and continuing through the end of April 2014 and thereafter.

16                  59) Plaintiff Myken Bomberger resides in Massachusetts, had a GAFE  
17 account through the Rhode Island School of Design, and used it to send and receive email  
18 starting in or about January 2011 and continuing through May 2013.

19                  60) Plaintiff Jesse Bonelli resides in New York, had a GAFE account  
20 through the Rhode Island School of Design, and used it to send and receive email starting  
21 in or about January 2011 and continuing through June 2012.

22                  61) Plaintiff Mariel Booth resides in Virginia, had a GAFE account  
23 through New York University, and used it to send and receive email starting in or about  
24 May 2011 and continuing through the end of April 2014 and thereafter.

25                  62) Plaintiff Michaela Borges resides in California, had a GAFE  
26 account through the University of California, Santa Cruz, and used it to send and receive  
27  
28

1 email starting in or about November 2011 and continuing through the end of April 2014  
2 and thereafter.

3           63) Plaintiff Max Brower resides in California, had a GAFE account  
4 through the University of Michigan, and used it to send and receive email starting in or  
5 about September 2013 and continuing through the end of April 2014 and thereafter.

6           64) Plaintiff Patricio Brito resides in Florida, had a GAFE account  
7 through Yale University, and used it to send and receive email starting in or about October  
8 2012 and continuing through the end of April 2014 and thereafter.

9           65) Plaintiff Daniel Brog resides in Massachusetts, had a GAFE  
10 account through Brandeis University, and used it to send and receive email starting in or  
11 about January 2011 and continuing through the end of April 2014 and thereafter.

12           66) Plaintiff Grant Bronsdon resides in Washington, had a GAFE  
13 account through Yale University, and used it to send and receive email starting in or about  
14 October 2012 and continuing through the end of April 2014 and thereafter.

15           67) Plaintiff Laura Bronson resides in Hawaii, had a GAFE account  
16 through the University of Hawaii, and used it to send and receive email starting in or  
17 about December 2011 and continuing through May 2012.

18           68) Plaintiff Jake Broser resides in New York, had a GAFE account  
19 through the University of Michigan, and used it to send and receive email starting in or  
20 about October 2012 and continuing through the end of April 2014 and thereafter.

21           69) Plaintiff Peter Broski resides in New York, had a GAFE account  
22 through the State University of New York at Stony Brook, and used it to send and receive  
23 email starting in or about October 2012 and continuing through the end of April 2014 and  
24 thereafter.

25           70) Plaintiff Barbara Brown resides in Virginia, had a GAFE account  
26 through Virginia Tech, and used it to send and receive email starting in or about  
27 December 2012 and continuing through December 2013.  
28

1                   71) Plaintiff Cameron Brown resides in Oregon, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about November 2011 and continuing through June 2012.

4                   72) Plaintiff Noranda Brown resides in Massachusetts, had a GAFE  
5 account through Brandeis University, and used it to send and receive email starting in or  
6 about September 2013 and continuing through the end of April 2014 and thereafter.

7                   73) Plaintiff Mark Brunton resides in Maine, had a GAFE account  
8 through the University of Maine, and used it to send and receive email starting in or about  
9 September 2009 and continuing through the end of April 2014 and thereafter.

10                  74) Plaintiff Jonica Buck resides in California, had a GAFE account  
11 through the University of California, Santa Cruz, and used it to send and receive email  
12 starting in or about September 2013 and continuing through the end of April 2014 and  
13 thereafter.

14                  75) Plaintiff John Buell resides in Washington, had a GAFE account  
15 through Pacific Lutheran University, and used it to send and receive email starting in or  
16 about September 2009 and continuing through June 2013.

17                  76) Plaintiff Wrenn Bunker-Koesters resides in Hawaii, had a GAFE  
18 account through the University of Arizona, and used it to send and receive email starting  
19 in or about August 2010 and continuing through the end of April 2014 and thereafter.

20                  77) Plaintiff Ryan Burke resides in California, had a GAFE account  
21 through the University of California, Berkeley, and used it to send and receive email  
22 starting in or about November 2012 and continuing through June 2013.

23                  78) Plaintiff Adam Buxbaum resides in California, had a GAFE  
24 account through the University of California, Santa Cruz, and used it to send and receive  
25 email starting in or about November 2011 and continuing through June 2012.

26                  79) Plaintiff Janel Calinog resides in California, had a GAFE account  
27 through the University of California, Santa Cruz, and used it to send and receive email  
28

1 starting in or about November 2011 and continuing through the end of April 2014 and  
2 thereafter.

3 80) Plaintiff Francesca Campos resides in California, had a GAFE  
4 account through the University of California, Santa Cruz, and used it to send and receive  
5 email starting in or about September 2013 and continuing through the end of April 2014  
6 and thereafter.

7 81) Plaintiff Katherine Cannon resides in California, had a GAFE  
8 account through the University of California, Santa Cruz, and used it to send and receive  
9 email starting in or about November 2011 and continuing through the end of April 2014  
10 and thereafter.

11 82) Plaintiff Veronica Cano Chavez resides in California, had a GAFE  
12 account through the University of California, Santa Cruz, and used it to send and receive  
13 email starting in or about November 2011 and continuing through June 2012.

14 83) Plaintiff Lauren Carlton resides in California, had a GAFE account  
15 through the University of California, Santa Cruz, and used it to send and receive email  
16 starting in or about November 2011 and continuing through the end of April 2014 and  
17 thereafter.

18 84) Plaintiff Christian Carrillo resides in California, had a GAFE  
19 account through the University of California, Santa Cruz, and used it to send and receive  
20 email starting in or about November 2011 and continuing through June 2013.

21 85) Plaintiff Lauren Cason resides in California, had a GAFE account  
22 through the Rhode Island School of Design, and used it to send and receive email starting  
23 in or about January 2011 and continuing through March 2012.

24 86) Plaintiff Rachel Castiglione resides in Michigan, had a GAFE  
25 account through the University of Michigan, and used it to send and receive email starting  
26 in or about October 2012 and continuing through the end of April 2014 and thereafter.  
27  
28

1                   87) Plaintiff Brittany Castillo resides in New York, had a GAFE  
2 account through the University of California, Santa Cruz, and used it to send and receive  
3 email starting in or about August 2012 and continuing through December 2012.

4                   88) Plaintiff Karen Catlow resides in Rhode Island, had a GAFE  
5 account through Boston University, and used it to send and receive email starting in or  
6 about September 2013 and continuing through the end of April 2014 and thereafter.

7                   89) Plaintiff Samuel Cavazos resides in Illinois, had a GAFE account  
8 through Northwestern University, and used it to send and receive email starting in or  
9 about September 2013 and continuing through the end of April 2014 and thereafter.

10                  90) Plaintiff Alexander Cerjan resides in California, had a GAFE  
11 account through Yale University, and used it to send and receive email starting in or about  
12 October 2012 and continuing through the end of April 2014 and thereafter.

13                  91) Plaintiff Meagan Chamberlain resides in California, had a GAFE  
14 account through the University of California, Santa Cruz, and used it to send and receive  
15 email starting in or about November 2011 and continuing through the end of April 2014  
16 and thereafter.

17                  92) Plaintiff Brett Chamberlin resides in New York, had a GAFE  
18 account through New York University, and used it to send and receive email starting in or  
19 about May 2011 and continuing through December 2012.

20                  93) Plaintiff Kevin Chaney resides in Arizona, had a GAFE account  
21 through the University of Arizona, and used it to send and receive email starting in or  
22 about August 2012 and continuing through the end of April 2014 and thereafter.

23                  94) Plaintiff Brian Chang resides in New Jersey, had a GAFE account  
24 through New York University, and used it to send and receive email starting in or about  
25 May 2011 and continuing through December 2013.



1                   95) Plaintiff Thomas Chavez resides in New Jersey, had a GAFE  
2 account through New York University, and used it to send and receive email starting in or  
3 about September 2011 and continuing through the end of April 2014 and thereafter.

4                   96) Plaintiff Jonathan Chen resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about September 2013 and continuing through the end of April 2014 and  
7 thereafter.

8                   97) Plaintiff Randy Cherland resides in Washington, had a GAFE  
9 account through Pacific Lutheran University, and used it to send and receive email  
10 starting in or about September 2013 and continuing through the end of April 2014 and  
11 thereafter.

12                   98) Plaintiff Ritish Chhabra resides in Michigan, had a GAFE account  
13 through the University of Michigan, and used it to send and receive email starting in or  
14 about October 2012 and continuing through December 2013.

15                   99) Plaintiff Daniel Chiang resides in Florida, had a GAFE account  
16 through Boston University, and used it to send and receive email starting in or about  
17 September 2011 and continuing through May 2012.

18                   100) Plaintiff Nina Chidichimo resides in New York, had a GAFE  
19 account through the Rhode Island School of Design, and used it to send and receive email  
20 starting in or about January 2011 and continuing through June 2011.

21                   101) Plaintiff Cody Childers resides in California, had a GAFE account  
22 through the University of California, Santa Cruz, and used it to send and receive email  
23 starting in or about November 2011 and continuing through the end of April 2014 and  
24 thereafter.

25                   102) Plaintiff Sandra Childress resides in Arizona, had a GAFE account  
26 through the University of Arizona, and used it to send and receive email starting in or  
27 about August 2013 and continuing through the end of April 2014 and thereafter.  
28

1                   103) Plaintiff James Chiocchio resides in New York, had a GAFE  
2 account through the State University of New York at Stony Brook, and used it to send and  
3 receive email starting in or about October 2012 and continuing through the end of April  
4 2014 and thereafter.

5                   104) Plaintiff Michael Choi resides in California, had a GAFE account  
6 through the University of California, Berkeley, and used it to send and receive email  
7 starting in or about November 2012 and continuing through the end of April 2014 and  
8 thereafter.

9                   105) Plaintiff Ref Chowdhury resides in Arizona, had a GAFE account  
10 through the University of Hawaii, and used it to send and receive email starting in or  
11 about December 2011 and continuing through May 2012.

12                   106) Plaintiff Allen Chung resides in California, had a GAFE account  
13 through the University of California, Berkeley, and used it to send and receive email  
14 starting in or about January 2013 and continuing through the end of April 2014 and  
15 thereafter.

16                   107) Plaintiff Chelsea Clark resides in California, had a GAFE account  
17 through the University of California, Santa Cruz, and used it to send and receive email  
18 starting in or about November 2011 and continuing through the end of April 2014 and  
19 thereafter.

20                   108) Plaintiff Jordan Colclasure resides in New Jersey, had a GAFE  
21 account through Yale University, and used it to send and receive email starting in or about  
22 October 2012 and continuing through the end of April 2014 and thereafter.

23                   109) Plaintiff Lisette Cole resides in Arizona, had a GAFE account  
24 through the University of Arizona, and used it to send and receive email starting in or  
25 about January 2010 and continuing through May 2013.  
26  
27  
28

1                   110) Plaintiff Andrew Collins resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about November 2011 and continuing through January 2013.

4                   111) Plaintiff Stephen Colon resides in New York, had a GAFE account  
5 through the University of Connecticut, and used it to send and receive email starting in or  
6 about December 2012 and continuing through August 2013.

7                   112) Plaintiff Andrew Colucci resides in Massachusetts, had a GAFE  
8 account through Boston University, and used it to send and receive email starting in or  
9 about September 2011 and continuing through June 2012.

10                  113) Plaintiff Ethan Compton resides in Virginia, had a GAFE account  
11 through Virginia Tech, and used it to send and receive email starting in or about  
12 December 2012 and continuing through the end of April 2014 and thereafter.

13                  114) Plaintiff Emily Connelly resides in California, had a GAFE account  
14 through the University of California, Berkeley, and used it to send and receive email  
15 starting in or about November 2012 and continuing through the end of April 2014 and  
16 thereafter.

17                  115) Plaintiff Julianne Conrad resides in Illinois, had a GAFE account  
18 through the Rhode Island School of Design, and used it to send and receive email starting  
19 in or about June 2012 and continuing through the end of April 2014 and thereafter.

20                  116) Plaintiff Logan Cooper resides in Germany, had a GAFE account  
21 through the University of California, Santa Cruz, and used it to send and receive email  
22 starting in or about September 2012 and continuing through the end of April 2014 and  
23 thereafter.

24                  117) Plaintiff Tiffany Cooper resides in New York, had a GAFE account  
25 through the Rhode Island School of Design, and used it to send and receive email starting  
26 in or about January 2011 and continuing through June 2012.

1                   118) Plaintiff Heather Copps resides in Arizona, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about March 2014 and continuing through the end of April 2014 and thereafter.

4                   119) Plaintiff Harrison Corbett resides in California, had a GAFE  
5 account through the University of California, Berkeley, and used it to send and receive  
6 email starting in or about November 2012 and continuing through the end of April 2014  
7 and thereafter.

8                   120) Plaintiff Jeremy Cordeiro resides in Hawaii, had a GAFE account  
9 through the University of Hawaii, and used it to send and receive email starting in or  
10 about December 2011 and continuing through July 2012.

11                   121) Plaintiff Nicholas Corpuz resides in Utah, had a GAFE account  
12 through New York University, and used it to send and receive email starting in or about  
13 September 2012 and continuing through the end of April 2014 and thereafter.

14                   122) Plaintiff Eudald Correig Fraga resides in Spain, had a GAFE  
15 account through the University of California, Santa Cruz, and used it to send and receive  
16 email starting in or about August 2013 and continuing through the end of April 2014 and  
17 thereafter.

18                   123) Plaintiff Erica Cortez resides in California, had a GAFE account  
19 through the University of California, Santa Cruz, and used it to send and receive email  
20 starting in or about September 2012 and continuing through the end of April 2014 and  
21 thereafter.

22                   124) Plaintiff Renata Costa resides in Illinois, had a GAFE account  
23 through the University of Michigan, and used it to send and receive email starting in or  
24 about October 2012 and continuing through May 2013.

25                   125) Plaintiff Joshua Cottrell-Schloemer resides in California, had a  
26 GAFE account through the University of California, Santa Cruz, and used it to send and  
27 receive email starting in or about November 2011 and continuing through January 2014.  
28

1                   126) Plaintiff Layton Cox resides in Arizona, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about January 2010 and continuing through December 2013.

4                   127) Plaintiff Marlee Craker resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about September 2012 and continuing through the end of April 2014 and  
7 thereafter.

8                   128) Plaintiff Dax Crocker resides in Connecticut, had a GAFE account  
9 through the University of Arizona, and used it to send and receive email starting in or  
10 about August 2012 and continuing through the end of April 2014 and thereafter.

11                   129) Plaintiff Rory Crook resides in Michigan, had a GAFE account  
12 through the University of Michigan, and used it to send and receive email starting in or  
13 about October 2012 and continuing through May 2013.

14                   130) Plaintiff Pierre Cuglievan resides in New York, had a GAFE  
15 account through New York University, and used it to send and receive email starting in or  
16 about August 2011 and continuing through the end of April 2014 and thereafter.

17                   131) Plaintiff Stephen D'Addio resides in Florida, had a GAFE account  
18 through the University of Arizona, and used it to send and receive email starting in or  
19 about January 2010 and continuing through May 2013.

20                   132) Plaintiff Mark Dalgaard resides in Illinois, had a GAFE account  
21 through Northwestern University, and used it to send and receive email starting in or  
22 about September 2006 and continuing through the end of April 2014 and thereafter.

23                   133) Plaintiff Bret Dalldorf resides in California, had a GAFE account  
24 through the University of California, Santa Cruz, and used it to send and receive email  
25 starting in or about November 2011 and continuing through the end of April 2014 and  
26 thereafter.

1                   134) Plaintiff Joseph Danehower resides in South Carolina, had a GAFE  
2 account through Virginia Tech, and used it to send and receive email starting in or about  
3 December 2012 and continuing through May 2013.

4                   135) Plaintiff Zachari Daquioag resides in California, had a GAFE  
5 account through the University of California, Santa Cruz, and used it to send and receive  
6 email starting in or about September 2008 and continuing through December 2012.

7                   136) Plaintiff Deborah Davis resides in Arizona, had a GAFE account  
8 through the University of Arizona, and used it to send and receive email starting in or  
9 about January 2010 and continuing through May 2012.

10                  137) Plaintiff Eli Davis resides in Michigan, had a GAFE account  
11 through the University of Michigan, and used it to send and receive email starting in or  
12 about October 2012 and continuing through the end of April 2014 and thereafter.

13                  138) Plaintiff Katrina Davis resides in Arizona, had a GAFE account  
14 through the University of Arizona, and used it to send and receive email starting in or  
15 about January 2014 and continuing through the end of April 2014 and thereafter.

16                  139) Plaintiff Hillary Dawsey resides in Arizona, had a GAFE account  
17 through the University of Arizona, and used it to send and receive email starting in or  
18 about January 2010 and continuing through May 2013.

19                  140) Plaintiff Joseph De Jonge resides in New York, had a GAFE  
20 account through Brown University, and used it to send and receive email starting in or  
21 about September 2009 and continuing through the end of April 2014 and thereafter.

22                  141) Plaintiff Paul De La Torre resides in Arizona, had a GAFE account  
23 through the University of Arizona, and used it to send and receive email starting in or  
24 about January 2010 and continuing through May 2012.

25                  142) Plaintiff Brenda De Leon resides in California, had a GAFE  
26 account through the University of California, Santa Cruz, and used it to send and receive  
27

1 email starting in or about September 2013 and continuing through the end of April 2014  
2 and thereafter.

3 143) Plaintiff Juliet Deamicis resides in California, had a GAFE account  
4 through the University of California, Santa Cruz, and used it to send and receive email  
5 starting in or about September 2010 and continuing through the end of April 2014 and  
6 thereafter.

7 144) Plaintiff Tyler Deangelis resides in New Jersey, had a GAFE  
8 account through the University of Maine, and used it to send and receive email starting in  
9 or about September 2012 and continuing through the end of April 2014 and thereafter.

10 145) Plaintiff Michael Deck resides in Illinois, had a GAFE account  
11 through Northwestern University, and used it to send and receive email starting in or  
12 about September 2007 and continuing through June 2011.

13 146) Plaintiff Anthony Del Cid resides in California, had a GAFE  
14 account through the University of California, Santa Cruz, and used it to send and receive  
15 email starting in or about September 2012 and continuing through the end of April 2014  
16 and thereafter.

17 147) Plaintiff Danielle Delbert resides in Colorado, had a GAFE account  
18 through the University of Arizona, and used it to send and receive email starting in or  
19 about August 2010 and continuing through the end of April 2014 and thereafter.

20 148) Plaintiff Maxwell Denny resides in California, had a GAFE account  
21 through the University of California, Santa Cruz, and used it to send and receive email  
22 starting in or about November 2011 and continuing through December 2012.

23 149) Plaintiff Daniel Diaz resides in California, had a GAFE account  
24 through the University of Michigan, and used it to send and receive email starting in or  
25 about October 2012 and continuing through May 2013.

26 150) Plaintiff Lillian DiCarlo (formerly Taylor) resides in Florida, had a  
27 GAFE account through the University of California, Santa Cruz, and used it to send and  
28



1 receive email starting in or about September 2013 and continuing through the end of April  
2 2014 and thereafter.

3 151) Plaintiff Jeremy Diehl resides in Michigan, had a GAFE account  
4 through the University of Michigan, and used it to send and receive email starting in or  
5 about January 2013 and continuing through the end of April 2014 and thereafter.

6 152) Plaintiff Amber Diluzio resides in California, had a GAFE account  
7 through the University of California, Santa Cruz, and used it to send and receive email  
8 starting in or about November 2011 and continuing through the end of April 2014 and  
9 thereafter.

10 153) Plaintiff Brian Dinh resides in California, had a GAFE account  
11 through the University of California, Santa Cruz, and used it to send and receive email  
12 starting in or about November 2011 and continuing through June 2013.

13 154) Plaintiff Vincent Dirienzo resides in Hawaii, had a GAFE account  
14 through the University of Hawaii, and used it to send and receive email starting in or  
15 about December 2011 and continuing through the end of April 2014 and thereafter.

16 155) Plaintiff Blake Disiere resides in Illinois, had a GAFE account  
17 through Northwestern University, and used it to send and receive email starting in or  
18 about September 2012 and continuing through the end of April 2014 and thereafter.

19 156) Plaintiff Alexander Dobranic resides in Nevada, had a GAFE  
20 account through the University of California, Santa Cruz, and used it to send and receive  
21 email starting in or about January 2010 and continuing through August 2011.

22 157) Plaintiff Edward Dobyns resides in Illinois, had a GAFE account  
23 through Virginia Tech, and used it to send and receive email starting in or about  
24 December 2012 and continuing through May 2013.

25 158) Plaintiff Aaron Doucett resides in Massachusetts, had a GAFE  
26 account through the State University of New York at Stony Brook, and used it to send and  
27 receive email starting in or about October 2012 and continuing through May 2013.  
28

1                   159) Plaintiff Phillip Dove resides in California, had a GAFE account  
2 through the University of California, Berkeley, and used it to send and receive email  
3 starting in or about November 2012 and continuing through May 2013.

4                   160) Plaintiff Octav Dragoi resides in Massachusetts, had a GAFE  
5 account through Harvard University, and used it to send and receive email starting in or  
6 about August 2012 and continuing through the end of April 2014 and thereafter.

7                   161) Plaintiff Sean Draper resides in California, had a GAFE account  
8 through the University of California, Santa Cruz, and used it to send and receive email  
9 starting in or about November 2011 and continuing through the end of April 2014 and  
10 thereafter.

11                   162) Plaintiff Chris Driscoll resides in Arizona, had a GAFE account  
12 through the University of Arizona, and used it to send and receive email starting in or  
13 about January 2010 and continuing through January 2011.

14                   163) Plaintiff Aliah Drow resides in Arizona, had a GAFE account  
15 through the University of Arizona, and used it to send and receive email starting in or  
16 about August 2012 and continuing through June 2013.

17                   164) Plaintiff Krista Drummond resides in Montana, had a GAFE  
18 account through the University of Arizona, and used it to send and receive email starting  
19 in or about August 2012 and continuing through the end of April 2014 and thereafter.

20                   165) Plaintiff Kenneth Duckworth resides in California, had a GAFE  
21 account through the University of California, Santa Cruz, and used it to send and receive  
22 email starting in or about November 2011 and continuing through June 2013.

23                   166) Plaintiff David Dulle resides in Georgia, had a GAFE account  
24 through New York University, and used it to send and receive email starting in or about  
25 May 2011 and continuing through May 2012.

26                   167) Plaintiff Julia Dunn resides in California, had a GAFE account  
27 through the University of California, Santa Cruz, and used it to send and receive email  
28

1 starting in or about November 2011 and continuing through the end of April 2014 and  
2 thereafter.

3 168) Plaintiff Samuel Dunscombe resides in California, had a GAFE  
4 account through the University of California, Santa Cruz, and used it to send and receive  
5 email starting in or about November 2011 and continuing through the end of April 2014  
6 and thereafter.

7 169) Plaintiff John Durbin resides in New York, had a GAFE account  
8 through the University of Arizona, and used it to send and receive email starting in or  
9 about August 2011 and continuing through the end of April 2014 and thereafter.

10 170) Plaintiff Michael Easterby resides in Maine, had a GAFE account  
11 through the University of Maine, and used it to send and receive email starting in or about  
12 September 2010 and continuing through December 2013.

13 171) Plaintiff Andrew Ecord resides in California, had a GAFE account  
14 through the University of California, Santa Cruz, and used it to send and receive email  
15 starting in or about November 2011 and continuing through July 2013.

16 172) Plaintiff Bianca Edwards resides in California, had a GAFE account  
17 through the University of California, Santa Cruz, and used it to send and receive email  
18 starting in or about November 2011 and continuing through the end of April 2014 and  
19 thereafter.

20 173) Plaintiff Daniel Elkus resides in Michigan, had a GAFE account  
21 through the University of Michigan, and used it to send and receive email starting in or  
22 about October 2012 and continuing through the end of April 2014 and thereafter.

23 174) Plaintiff Zina Ellis resides in New York, had a GAFE account  
24 through Yale University, and used it to send and receive email starting in or about October  
25 2012 and continuing through the end of April 2014 and thereafter.  
26  
27  
28

1                   175) Plaintiff Aunna Elrod resides in Michigan, had a GAFE account  
2 through the University of Michigan, and used it to send and receive email starting in or  
3 about January 2013 and continuing through the end of April 2014 and thereafter.

4                   176) Plaintiff Colton Emel resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about September 2013 and continuing through the end of April 2014 and  
7 thereafter.

8                   177) Plaintiff Justin Emery resides in Michigan, had a GAFE account  
9 through the Michigan Technological University, and used it to send and receive email  
10 starting in or about March 2012 and continuing through May 2013.

11                   178) Plaintiff Chase Engelhardt resides in California, had a GAFE  
12 account through the University of California, Santa Cruz, and used it to send and receive  
13 email starting in or about October 2012 and continuing through the end of April 2014 and  
14 thereafter.

15                   179) Plaintiff Jonathan Englehart resides in Maine, had a GAFE account  
16 through the University of Maine, and used it to send and receive email starting in or about  
17 June 2009 and continuing through May 2013.

18                   180) Plaintiff Ian Epps resides in California, had a GAFE account  
19 through the University of California, Santa Cruz, and used it to send and receive email  
20 starting in or about September 2012 and continuing through the end of April 2014 and  
21 thereafter.

22                   181) Plaintiff Michelle Erford resides in Illinois, had a GAFE account  
23 through New York University, and used it to send and receive email starting in or about  
24 August 2011 and continuing through May 2012.

25                   182) Plaintiff Mariah Erlick resides in Washington, had a GAFE account  
26 through Brown University, and used it to send and receive email starting in or about  
27 September 2009 and continuing through May 2011.  
28

1                   183) Plaintiff Julie Etheridge resides in Washington, had a GAFE  
2 account through the University of Arizona, and used it to send and receive email starting  
3 in or about January 2010 and continuing through May 2013.

4                   184) Plaintiff Rachel Ett resides in South Carolina, had a GAFE account  
5 through Yale University, and used it to send and receive email starting in or about October  
6 2012 and continuing through the end of April 2014 and thereafter.

7                   185) Plaintiff Carl Evans resides in Illinois, had a GAFE account  
8 through Northwestern University, and used it to send and receive email starting in or  
9 about September 2010 and continuing through the end of April 2014 and thereafter.

10                  186) Plaintiff James Everglade resides in Hawaii, had a GAFE account  
11 through the University of Hawaii, and used it to send and receive email starting in or  
12 about December 2011 and continuing through May 2012.

13                  187) Plaintiff Bryan Eysers resides in Maryland, had a GAFE account  
14 through the University of Michigan, and used it to send and receive email starting in or  
15 about October 2012 and continuing through the end of April 2014 and thereafter.

16                  188) Plaintiff Holden Faber resides in Illinois, had a GAFE account  
17 through Northwestern University, and used it to send and receive email starting in or  
18 about September 2010 and continuing through the end of April 2014 and thereafter.

19                  189) Plaintiff Kelsey Fahey resides in Maine, had a GAFE account  
20 through the University of Maine, and used it to send and receive email starting in or about  
21 August 2009 and continuing through the end of April 2014 and thereafter.

22                  190) Plaintiff Roger Fairley resides in California, had a GAFE account  
23 through the University of California, Santa Cruz, and used it to send and receive email  
24 starting in or about November 2011 and continuing through June 2011.

25                  191) Plaintiff Sean Fanning resides in Michigan, had a GAFE account  
26 through the University of Michigan, and used it to send and receive email starting in or  
27 about September 2013 and continuing through the end of April 2014 and thereafter.  
28

1                   192) Plaintiff Robert Farrar resides in California, had a GAFE account  
2 through the Rhode Island School of Design, and used it to send and receive email starting  
3 in or about January 2011 and continuing through the end of April 2014 and thereafter.

4                   193) Plaintiff Kelsey Farrell resides in Pennsylvania, had a GAFE  
5 account through Boston University, and used it to send and receive email starting in or  
6 about September 2011 and continuing through May 2013.

7                   194) Plaintiff Anton Fedorov resides in New York, had a GAFE account  
8 through Brandeis University, and used it to send and receive email starting in or about  
9 January 2011 and continuing through May 2012.

10                  195) Plaintiff Julia Feldman resides in Maryland, had a GAFE account  
11 through the University of Michigan, and used it to send and receive email starting in or  
12 about October 2012 and continuing through the end of April 2014 and thereafter.

13                  196) Plaintiff James Feng resides in New York, had a GAFE account  
14 through New York University, and used it to send and receive email starting in or about  
15 May 2011 and continuing through the end of April 2014 and thereafter.

16                  197) Plaintiff Kristy Fenning resides in New York, had a GAFE account  
17 through the University of Maine, and used it to send and receive email starting in or about  
18 August 2009 and continuing through May 2013.

19                  198) Plaintiff Daniel Fernandez resides in Arizona, had a GAFE account  
20 through the University of Arizona, and used it to send and receive email starting in or  
21 about September 2011 and continuing through the end of April 2014 and thereafter.

22                  199) Plaintiff Tova Ferstenberg resides in New Jersey, had a GAFE  
23 account through Brandeis University, and used it to send and receive email starting in or  
24 about January 2011 and continuing through May 2012.

25                  200) Plaintiff Jose Figueroa Delgado resides in California, had a GAFE  
26 account through the University of California, Santa Cruz, and used it to send and receive  
27  
28

1 email starting in or about November 2011 and continuing through the end of April 2014  
2 and thereafter.

3           201) Plaintiff Zachary Finch resides in Oregon, had a GAFE account  
4 through the University of California, Santa Cruz, and used it to send and receive email  
5 starting in or about November 2011 and continuing through the end of April 2014 and  
6 thereafter.

7           202) Plaintiff Matthew Fisherkeller resides in California, had a GAFE  
8 account through the University of California, Santa Cruz, and used it to send and receive  
9 email starting in or about November 2011 and continuing through December 2013.

10           203) Plaintiff Michael Flagg resides in Arizona, had a GAFE account  
11 through the University of Arizona, and used it to send and receive email starting in or  
12 about August 2010 and continuing through the end of April 2014 and thereafter.

13           204) Plaintiff Brandon Flannery resides in California, had a GAFE  
14 account through the University of California, Berkeley, and used it to send and receive  
15 email starting in or about August 2013 and continuing through the end of April 2014 and  
16 thereafter.

17           205) Plaintiff Cynthia Flores resides in California, had a GAFE account  
18 through the University of California, Santa Cruz, and used it to send and receive email  
19 starting in or about November 2011 and continuing through July 2013.

20           206) Plaintiff Kimberly Flores resides in California, had a GAFE  
21 account through the University of California, Santa Cruz, and used it to send and receive  
22 email starting in or about November 2011 and continuing through the end of April 2014  
23 and thereafter.

24           207) Plaintiff Skylar Florian resides in Connecticut, had a GAFE account  
25 through the University of Connecticut, and used it to send and receive email starting in or  
26 about December 2012 and continuing through December 2013.



1                   208) Plaintiff Ryan Flynn resides in Michigan, had a GAFE account  
2 through the University of Michigan, and used it to send and receive email starting in or  
3 about October 2012 and continuing through the end of April 2014 and thereafter.

4                   209) Plaintiff Corinne Foley resides in Hawaii, had a GAFE account  
5 through the University of Hawaii, and used it to send and receive email starting in or  
6 about December 2013 and continuing through the end of April 2014 and thereafter.

7                   210) Plaintiff John Forbes resides in California, had a GAFE account  
8 through Northwestern University, and used it to send and receive email starting in or  
9 about September 2011 and continuing through the end of April 2014 and thereafter.

10                  211) Plaintiff Alexandria Foster resides in California, had a GAFE  
11 account through the University of California, Santa Cruz, and used it to send and receive  
12 email starting in or about November 2011 and continuing through the end of April 2014  
13 and thereafter.

14                  212) Plaintiff Shannon Fouts resides in Arizona, had a GAFE account  
15 through Pacific Lutheran University, and used it to send and receive email starting in or  
16 about July 2009 and continuing through December 2011.

17                  213) Plaintiff David Frailey resides in Michigan, had a GAFE account  
18 through the University of Michigan, and used it to send and receive email starting in or  
19 about October 2012 and continuing through the end of April 2014 and thereafter.

20                  214) Plaintiff Samuel Frank resides in California, had a GAFE account  
21 through the University of California, Santa Cruz, and used it to send and receive email  
22 starting in or about November 2011 and continuing through the end of April 2014 and  
23 thereafter.

24                  215) Plaintiff Joel Frattini resides in California, had a GAFE account  
25 through the University of California, Santa Cruz, and used it to send and receive email  
26 starting in or about September 2012 and continuing through the end of April 2014 and  
27 thereafter.  
28

1                   216) Plaintiff Mark Fredrickson resides in California, had a GAFE  
2 account through the University of California, Berkeley, and used it to send and receive  
3 email starting in or about September 2013 and continuing through the end of April 2014  
4 and thereafter.

5                   217) Plaintiff Mark Freeman resides in California, had a GAFE account  
6 through San Diego State University, and used it to send and receive email starting in or  
7 about November 2011 and continuing through the end of April 2014 and thereafter.

8                   218) Plaintiff Matthew Freifeld resides in New York, had a GAFE  
9 account through the University of Michigan, and used it to send and receive email starting  
10 in or about October 2012 and continuing through the end of April 2014 and thereafter.

11                   219) Plaintiff Charles Fukai resides in California, had a GAFE account  
12 through the University of California, Santa Cruz, and used it to send and receive email  
13 starting in or about November 2011 and continuing through June 2012.

14                   220) Plaintiff Thaine Fuller resides in Minnesota, had a GAFE account  
15 through the Michigan Technological University, and used it to send and receive email  
16 starting in or about March 2012 and continuing through the end of April 2014 and  
17 thereafter.

18                   221) Plaintiff Megan Gaebler resides in Illinois, had a GAFE account  
19 through the University of California, Santa Cruz, and used it to send and receive email  
20 starting in or about November 2011 and continuing through June 2011.

21                   222) Plaintiff Brian Gamez resides in California, had a GAFE account  
22 through the University of California, Santa Cruz, and used it to send and receive email  
23 starting in or about January 2014 and continuing through the end of April 2014 and  
24 thereafter.

25                   223) Plaintiff Mary Garcia resides in California, had a GAFE account  
26 through the University of California, Santa Cruz, and used it to send and receive email  
27  
28

1 starting in or about November 2011 and continuing through the end of April 2014 and  
2 thereafter.

3           224) Plaintiff Abigail Gardner resides in Illinois, had a GAFE account  
4 through Northwestern University, and used it to send and receive email starting in or  
5 about September 2011 and continuing through the end of April 2014 and thereafter.

6           225) Plaintiff Kenneth Garges resides in California, had a GAFE account  
7 through the University of California, Santa Cruz, and used it to send and receive email  
8 starting in or about November 2011 and continuing through the end of April 2014 and  
9 thereafter.

10           226) Plaintiff Daniel Gauthier resides in Oregon, had a GAFE account  
11 through the University of Arizona, and used it to send and receive email starting in or  
12 about August 2010 and continuing through the end of April 2014 and thereafter.

13           227) Plaintiff Nicole Gedert resides in Michigan, had a GAFE account  
14 through the University of Michigan, and used it to send and receive email starting in or  
15 about September 2013 and continuing through the end of April 2014 and thereafter.

16           228) Plaintiff Benjamin Geilich resides in Massachusetts, had a GAFE  
17 account through Brown University, and used it to send and receive email starting in or  
18 about September 2009 and continuing through June 2012.

19           229) Plaintiff Paula Gelvez-Petrone resides in New York, had a GAFE  
20 account through New York University, and used it to send and receive email starting in or  
21 about May 2011 and continuing through the end of April 2014 and thereafter.

22           230) Plaintiff Michael Geyer resides in California, had a GAFE account  
23 through the University of California, Santa Cruz, and used it to send and receive email  
24 starting in or about August 2012 and continuing through the end of April 2014 and  
25 thereafter.

26           231) Plaintiff Rajan Gill resides in California, had a GAFE account  
27 through the University of California, Santa Cruz, and used it to send and receive email  
28

1 starting in or about September 2013 and continuing through the end of April 2014 and  
2 thereafter.

3           232) Plaintiff James Gillooley resides in Washington, D.C., had a GAFE  
4 account through Boston University, and used it to send and receive email starting in or  
5 about January 2014 and continuing through the end of April 2014 and thereafter.

6           233) Plaintiff Jessica Giusti resides in Washington, had a GAFE account  
7 through the University of Hawaii, and used it to send and receive email starting in or  
8 about December 2011 and continuing through December 2013.

9           234) Plaintiff Jessica Golden resides in California, had a GAFE account  
10 through the University of California, Santa Cruz, and used it to send and receive email  
11 starting in or about November 2011 and continuing through January 2014.

12           235) Plaintiff Alex Goldklang resides in New York, had a GAFE account  
13 through Northwestern University, and used it to send and receive email starting in or  
14 about September 2008 and continuing through June 2012.

15           236) Plaintiff Matt Goldman resides in New York, had a GAFE account  
16 through New York University, and used it to send and receive email starting in or about  
17 August 2012 and continuing through the end of April 2014 and thereafter.

18           237) Plaintiff Joel Goldschlag resides in New York, had a GAFE account  
19 through New York University, and used it to send and receive email starting in or about  
20 September 2012 and continuing through the end of April 2014 and thereafter.

21           238) Plaintiff Leonardo Gonzalez resides in California, had a GAFE  
22 account through the University of California, Santa Cruz, and used it to send and receive  
23 email starting in or about November 2011 and continuing through December 2012.

24           239) Plaintiff Joseph Goodknight resides in Massachusetts, had a GAFE  
25 account through Harvard University, and used it to send and receive email starting in or  
26 about August 2011 and continuing through the end of April 2014 and thereafter.  
27  
28

1                   240) Plaintiff Joseph Gradias resides in Arizona, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about January 2010 and continuing through May 2012.

4                   241) Plaintiff Shari Gray resides in California, had a GAFE account  
5 through the University of California, Berkeley, and used it to send and receive email  
6 starting in or about November 2012 and continuing through the end of April 2014 and  
7 thereafter.

8                   242) Plaintiff Andrew Grazioli resides in New York, had a GAFE  
9 account through the University of Michigan, and used it to send and receive email starting  
10 in or about October 2012 and continuing through the end of April 2014 and thereafter.

11                   243) Plaintiff Joseph Greenbaum resides in Kansas, had a GAFE account  
12 through Northwestern University, and used it to send and receive email starting in or  
13 about September 2010 and continuing through the end of April 2014 and thereafter.

14                   244) Plaintiff Rachel Greenbaum resides in California, had a GAFE  
15 account through the University of California, Santa Cruz, and used it to send and receive  
16 email starting in or about November 2011 and continuing through the end of April 2014  
17 and thereafter.

18                   245) Plaintiff Robert Griego III resides in California, had a GAFE  
19 account through the University of California, Santa Cruz, and used it to send and receive  
20 email starting in or about September 2012 and continuing through the end of April 2014  
21 and thereafter.

22                   246) Plaintiff Peter Griffis resides in California, had a GAFE account  
23 through the University of Arizona, and used it to send and receive email starting in or  
24 about January 2010 and continuing through December 2013.

25                   247) Plaintiff Catherine Grizzell resides in California, had a GAFE  
26 account through the University of California, Santa Cruz, and used it to send and receive  
27  
28

1 email starting in or about August 2013 and continuing through the end of April 2014 and  
2 thereafter.

3           248) Plaintiff Derek Grosshart resides in Massachusetts, had a GAFE  
4 account through the University of Arizona, and used it to send and receive email starting  
5 in or about August 2011 and continuing through the end of April 2014 and thereafter.

6           249) Plaintiff Michael Guillory resides in California, had a GAFE  
7 account through the University of California, Santa Cruz, and used it to send and receive  
8 email starting in or about November 2011 and continuing through the end of April 2014  
9 and thereafter.

10           250) Plaintiff Seth Guldin resides in Virginia, had a GAFE account  
11 through Virginia Tech, and used it to send and receive email starting in or about  
12 December 2012 and continuing through the end of April 2014 and thereafter.

13           251) Plaintiff Bishal Gupta resides in California, had a GAFE account  
14 through Boston University, and used it to send and receive email starting in or about  
15 September 2012 and continuing through May 2012.

16           252) Plaintiff Samir Gupta resides in Texas, had a GAFE account  
17 through Harvard University, and used it to send and receive email starting in or about  
18 September 2012 and continuing through the end of April 2014 and thereafter.

19           253) Plaintiff Peter Gustafson resides in Louisiana, had a GAFE account  
20 through the State University of New York at Stony Brook, and used it to send and receive  
21 email starting in or about August 2013 and continuing through the end of April 2014 and  
22 thereafter.

23           254) Plaintiff Carmen Gutierrez resides in California, had a GAFE  
24 account through the University of California, Santa Cruz, and used it to send and receive  
25 email starting in or about September 2012 and continuing through the end of April 2014  
26 and thereafter.  
27  
28

1                   255) Plaintiff Jerrelle Guy resides in Massachusetts, had a GAFE  
2 account through the Rhode Island School of Design, and used it to send and receive email  
3 starting in or about January 2011 and continuing through June 2012.

4                   256) Plaintiff Acshi Haggenmiller resides in Connecticut, had a GAFE  
5 account through Yale University, and used it to send and receive email starting in or about  
6 October 2012 and continuing through the end of April 2014 and thereafter.

7                   257) Plaintiff Jerome Hale resides in Arizona, had a GAFE account  
8 through the University of Arizona, and used it to send and receive email starting in or  
9 about January 2010 and continuing through April 2012.

10                  258) Plaintiff Michael Hall resides in Idaho, had a GAFE account  
11 through the University of Arizona, and used it to send and receive email starting in or  
12 about January 2010 and continuing through May 2012.

13                  259) Plaintiff Nicholas Hall resides in Indiana, had a GAFE account  
14 through Northwestern University, and used it to send and receive email starting in or  
15 about August 2012 and continuing through the end of April 2014 and thereafter.

16                  260) Plaintiff Michael Hallock resides in North Carolina, had a GAFE  
17 account through Virginia Tech, and used it to send and receive email starting in or about  
18 December 2012 and continuing through December 2013.

19                  261) Plaintiff Mark Hamilton resides in Washington, had a GAFE  
20 account through the University of California, Santa Cruz, and used it to send and receive  
21 email starting in or about November 2011 and continuing through the end of April 2014  
22 and thereafter.

23                  262) Plaintiff Marina Handwerk resides in California, had a GAFE  
24 account through the University of California, Berkeley, and used it to send and receive  
25 email starting in or about November 2012 and continuing through May 2013.  
26  
27  
28

1                   263) Plaintiff Christine Hanna resides in Texas, had a GAFE account  
2 through the University of Michigan, and used it to send and receive email starting in or  
3 about January 2014 and continuing through the end of April 2014 and thereafter.

4                   264) Plaintiff Courtney Hanson resides in California, had a GAFE  
5 account through the University of California, Santa Cruz, and used it to send and receive  
6 email starting in or about November 2011 and continuing through the end of April 2014  
7 and thereafter.

8                   265) Plaintiff Sawyer Hardie resides in California, had a GAFE account  
9 through the University of California, Santa Cruz, and used it to send and receive email  
10 starting in or about November 2011 and continuing through the end of April 2014 and  
11 thereafter.

12                   266) Plaintiff Rebecca Hassinger resides in California, had a GAFE  
13 account through the University of California, Santa Cruz, and used it to send and receive  
14 email starting in or about November 2011 and continuing through March 2011.

15                   267) Plaintiff Quinn Hatoff resides in Washington, D.C., had a GAFE  
16 account through Harvard University, and used it to send and receive email starting in or  
17 about September 2011 and continuing through the end of April 2014 and thereafter.

18                   268) Plaintiff Eric Haviland resides in New York, had a GAFE account  
19 through the State University of New York at Stony Brook, and used it to send and receive  
20 email starting in or about April 2013 and continuing through the end of April 2014 and  
21 thereafter.

22                   269) Plaintiff Miles Hearn resides in Arizona, had a GAFE account  
23 through the University of Arizona, and used it to send and receive email starting in or  
24 about January 2010 and continuing through May 2012.

25                   270) Plaintiff Lauren Hebert resides in Arizona, had a GAFE account  
26 through the University of Arizona, and used it to send and receive email starting in or  
27 about January 2010 and continuing through May 2012.  
28



1                   271) Plaintiff Taylor Heisley-Cook resides in California, had a GAFE  
2 account through Northwestern University, and used it to send and receive email starting in  
3 or about September 2007 and continuing through June 2011.

4                   272) Plaintiff Richard Heitmeyer resides in California, had a GAFE  
5 account through the University of California, Santa Cruz, and used it to send and receive  
6 email starting in or about November 2011 and continuing through March 2012.

7                   273) Plaintiff Devon Henry resides in Virginia, had a GAFE account  
8 through Virginia Tech, and used it to send and receive email starting in or about  
9 December 2012 and continuing through April 2014.

10                  274) Plaintiff Nelson Hernandez resides in New Hampshire, had a GAFE  
11 account through Boston University, and used it to send and receive email starting in or  
12 about September 2011 and continuing through May 2012.

13                  275) Plaintiff Austin Herry resides in Washington, had a GAFE account  
14 through the University of Arizona, and used it to send and receive email starting in or  
15 about August 2010 and continuing through May 2013.

16                  276) Plaintiff Noah Hersom resides in Maine, had a GAFE account  
17 through the University of Maine, and used it to send and receive email starting in or about  
18 June 2009 and continuing through the end of April 2014 and thereafter.

19                  277) Plaintiff Jesse Hertz resides in New York, had a GAFE account  
20 through Boston University, and used it to send and receive email starting in or about  
21 September 2011 and continuing through January 2012.

22                  278) Plaintiff Elin Hervall resides in California, had a GAFE account  
23 through the University of California, Santa Cruz, and used it to send and receive email  
24 starting in or about November 2011 and continuing through the end of April 2014 and  
25 thereafter.

26                  279) Plaintiff Mitchell Heschke resides in California, had a GAFE  
27 account through the University of California, Berkeley, and used it to send and receive  
28

1 email starting in or about January 2013 and continuing through the end of April 2014 and  
2 thereafter.

3           280) Plaintiff Gordon Hiland resides in New York, had a GAFE account  
4 through the State University of New York at Stony Brook, and used it to send and receive  
5 email starting in or about August 2014 and continuing through the end of April 2014 and  
6 thereafter.

7           281) Plaintiff Cory Hill resides in California, had a GAFE account  
8 through the Rhode Island School of Design, and used it to send and receive email starting  
9 in or about January 2011 and continuing through March 2012.

10           282) Plaintiff Brandon Hodges resides in California, had a GAFE  
11 account through the University of California, Santa Cruz, and used it to send and receive  
12 email starting in or about November 2011 and continuing through June 2013.

13           283) Plaintiff Hailey Hollers resides in California, had a GAFE account  
14 through the University of Hawaii, and used it to send and receive email starting in or  
15 about January 2012 and continuing through June 2013.

16           284) Plaintiff Mark Hollwedel resides in New York, had a GAFE  
17 account through the State University of New York at Stony Brook, and used it to send and  
18 receive email starting in or about August 2013 and continuing through the end of April  
19 2014 and thereafter.

20           285) Plaintiff Demarie Holmes resides in Arizona, had a GAFE account  
21 through the University of Arizona, and used it to send and receive email starting in or  
22 about January 2010 and continuing through May 2011.

23           286) Plaintiff Nia Holston resides in Alabama, had a GAFE account  
24 through Yale University, and used it to send and receive email starting in or about October  
25 2012 and continuing through the end of April 2014 and thereafter.

1                   287) Plaintiff Tyler Howell resides in Washington, had a GAFE account  
2 through the University of Michigan, and used it to send and receive email starting in or  
3 about October 2012 and continuing through the end of April 2014 and thereafter.

4                   288) Plaintiff Ellen Howes resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about November 2011 and continuing through the end of April 2014 and  
7 thereafter.

8                   289) Plaintiff Kai Hoyt resides in Washington, had a GAFE account  
9 through Pacific Lutheran University, and used it to send and receive email starting in or  
10 about September 2010 and continuing through the end of April 2014 and thereafter.

11                   290) Plaintiff Nicholas Hoyt resides in Maryland, had a GAFE account  
12 through the University of Michigan, and used it to send and receive email starting in or  
13 about October 2012 and continuing through the end of April 2014 and thereafter.

14                   291) Plaintiff Sally Hu resides in New York, had a GAFE account  
15 through New York University, and used it to send and receive email starting in or about  
16 August 2013 and continuing through the end of April 2014 and thereafter.

17                   292) Plaintiff Kensai Hughes resides in New Jersey, had a GAFE  
18 account through Brandeis University, and used it to send and receive email starting in or  
19 about January 2011 and continuing through the end of April 2014 and thereafter.

20                   293) Plaintiff Kayla Hutchings resides in Illinois, had a GAFE account  
21 through Northwestern University, and used it to send and receive email starting in or  
22 about September 2010 and continuing through the end of April 2014 and thereafter.

23                   294) Plaintiff Torri Igou resides in California, had a GAFE account  
24 through the University of California, Santa Cruz, and used it to send and receive email  
25 starting in or about November 2011 and continuing through the end of April 2014 and  
26 thereafter.

1                   295) Plaintiff Timothy Irvine resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about November 2011 and continuing through June 2013.

4                   296) Plaintiff Jillian Jackson resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about September 2009 and continuing through May 2013.

7                   297) Plaintiff Chris Jacobson resides in Illinois, had a GAFE account  
8 through Northwestern University, and used it to send and receive email starting in or  
9 about August 2012 and continuing through the end of April 2014 and thereafter.

10                  298) Plaintiff Murtaza Jafferji resides in Washington, had a GAFE  
11 account through Brandeis University, and used it to send and receive email starting in or  
12 about January 2011 and continuing through June 2012.

13                  299) Plaintiff Yesenia Jameson resides in California, had a GAFE  
14 account through the University of California, Berkeley, and used it to send and receive  
15 email starting in or about November 2012 and continuing through the end of April 2014  
16 and thereafter.

17                  300) Plaintiff Gustavo Jauregui resides in California, had a GAFE  
18 account through the University of California, Berkeley, and used it to send and receive  
19 email starting in or about November 2012 and continuing through the end of April 2014  
20 and thereafter.

21                  301) Plaintiff Maria Jennings resides in California, had a GAFE account  
22 through the University of California, Santa Cruz, and used it to send and receive email  
23 starting in or about November 2011 and continuing through the end of April 2014 and  
24 thereafter.

25                  302) Plaintiff Jasmeet Jernaill resides in Connecticut, had a GAFE  
26 account through Yale University, and used it to send and receive email starting in or about  
27 October 2012 and continuing through the end of April 2014 and thereafter.  
28

1                   303) Plaintiff Thomas Jobst, Jr. resides in Virginia, had a GAFE account  
2 through Virginia Tech, and used it to send and receive email starting in or about  
3 December 2012 and continuing through the end of April 2014 and thereafter.

4                   304) Plaintiff Nina Johal resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about September 2013 and continuing through the end of April 2014 and  
7 thereafter.

8                   305) Plaintiff Joseph Johns resides in Arizona, had a GAFE account  
9 through the University of Arizona, and used it to send and receive email starting in or  
10 about January 2013 and continuing through the end of April 2014 and thereafter.

11                   306) Plaintiff Karl Johnson resides in New York, had a GAFE account  
12 through New York University, and used it to send and receive email starting in or about  
13 May 2011 and continuing through May 2012.

14                   307) Plaintiff Rosa Johnson resides in California, had a GAFE account  
15 through the University of California, Santa Cruz, and used it to send and receive email  
16 starting in or about June 2013 and continuing through the end of April 2014 and  
17 thereafter.

18                   308) Plaintiff Ryan Johnson resides in New Jersey, had a GAFE account  
19 through New York University, and used it to send and receive email starting in or about  
20 May 2011 and continuing through August 2013.

21                   309) Plaintiff Aaron Jones resides in Connecticut, had a GAFE account  
22 through Yale University, and used it to send and receive email starting in or about August  
23 2013 and continuing through the end of April 2014 and thereafter.

24                   310) Plaintiff Crystal Joseph resides in Hawaii, had a GAFE account  
25 through the University of Hawaii, and used it to send and receive email starting in or  
26 about December 2011 and continuing through the end of April 2014 and thereafter.  
27  
28

1                   311) Plaintiff Evan Kahn resides in California, had a GAFE account  
2 through the University of California, Berkeley, and used it to send and receive email  
3 starting in or about November 2012 and continuing through May 2013.

4                   312) Plaintiff Michael Kaspark resides in Michigan, had a GAFE  
5 account through the University of Michigan, and used it to send and receive email starting  
6 in or about October 2012 and continuing through the end of April 2014 and thereafter.

7                   313) Plaintiff Brandon Kassimir resides in New York, had a GAFE  
8 account through the University of Michigan, and used it to send and receive email starting  
9 in or about October 2012 and continuing through the end of April 2014 and thereafter.

10                  314) Plaintiff Archavanich Kawmongkolsi resides in California, had a  
11 GAFE account through the University of California, Santa Cruz, and used it to send and  
12 receive email starting in or about August 2013 and continuing through the end of April  
13 2014 and thereafter.

14                  315) Plaintiff Joseph Kayaleh resides in California, had a GAFE account  
15 through the University of California, Santa Cruz, and used it to send and receive email  
16 starting in or about November 2011 and continuing through June 2013.

17                  316) Plaintiff Jesse Kelly resides in Arizona, had a GAFE account  
18 through the University of Arizona, and used it to send and receive email starting in or  
19 about April 2011 and continuing through the end of April 2014 and thereafter.

20                  317) Plaintiff Aaron Kenny resides in New York, had a GAFE account  
21 through New York University, and used it to send and receive email starting in or about  
22 June 2012 and continuing through the end of April 2014 and thereafter.

23                  318) Plaintiff Siri Kirin Khalsa resides in New York, had a GAFE  
24 account through Boston University, and used it to send and receive email starting in or  
25 about September 2011 and continuing through May 2013.

26                  319) Plaintiff Aaron Khansefid resides in California, had a GAFE  
27 account through the University of California, Santa Cruz, and used it to send and receive  
28

1 email starting in or about September 2012 and continuing through the end of April 2014  
2 and thereafter.

3 320) Plaintiff B. Kim resides in Massachusetts, had a GAFE account  
4 through Boston University, and used it to send and receive email starting in or about  
5 September 2012 and continuing through the end of April 2014 and thereafter.

6 321) Plaintiff Dae Han Kim resides in New York, had a GAFE account  
7 through New York University, and used it to send and receive email starting in or about  
8 May 2011 and continuing through the end of April 2014 and thereafter.

9 322) Plaintiff Shawn Kim resides in California, had a GAFE account  
10 through the University of California, Santa Cruz, and used it to send and receive email  
11 starting in or about September 2012 and continuing through the end of April 2014 and  
12 thereafter.

13 323) Plaintiff Andrew King resides in California, had a GAFE account  
14 through the University of California, Berkeley, and used it to send and receive email  
15 starting in or about June 2013 and continuing through the end of April 2014 and  
16 thereafter.

17 324) Plaintiff Ryan King resides in California, had a GAFE account  
18 through the University of California, Santa Cruz, and used it to send and receive email  
19 starting in or about November 2011 and continuing through the end of April 2014 and  
20 thereafter.

21 325) Plaintiff Royce Kirk resides in California, had a GAFE account  
22 through the University of California, Santa Cruz, and used it to send and receive email  
23 starting in or about November 2011 and continuing through June 2013.

24 326) Plaintiff Carli Kitto resides in Washington, D.C., had a GAFE  
25 account through Virginia Tech, and used it to send and receive email starting in or about  
26 December 2012 and continuing through the end of April 2014 and thereafter.  
27  
28

1                   327) Plaintiff Jessica Klix resides in Hawaii, had a GAFE account  
2 through the University of Hawaii, and used it to send and receive email starting in or  
3 about August 2013 and continuing through the end of April 2014 and thereafter.

4                   328) Plaintiff Janice Knight resides in South Carolina, had a GAFE  
5 account through the University of Maine, and used it to send and receive email starting in  
6 or about June 2009 and continuing through May 2011.

7                   329) Plaintiff Justin Kohlberg resides in California, had a GAFE account  
8 through the University of California, Santa Cruz, and used it to send and receive email  
9 starting in or about November 2011 and continuing through the end of April 2014 and  
10 thereafter.

11                   330) Plaintiff Casey Kono resides in Hawaii, had a GAFE account  
12 through the University of Hawaii, and used it to send and receive email starting in or  
13 about August 2012 and continuing through the end of April 2014 and thereafter.

14                   331) Plaintiff Alec Konstantin resides in California, had a GAFE account  
15 through the University of California, Berkeley, and used it to send and receive email  
16 starting in or about November 2012 and continuing through the end of April 2014 and  
17 thereafter.

18                   332) Plaintiff Maksim Korolev resides in California, had a GAFE  
19 account through Harvard University, and used it to send and receive email starting in or  
20 about August 2011 and continuing through the end of April 2014 and thereafter.

21                   333) Plaintiff Tarun Koshy resides in Texas, had a GAFE account  
22 through the University of Michigan, and used it to send and receive email starting in or  
23 about October 2012 and continuing through May 2013.

24                   334) Plaintiff Kyle Kovacs resides in Michigan, had a GAFE account  
25 through the Michigan Technological University, and used it to send and receive email  
26 starting in or about March 2012 and continuing through May 2013.  
27  
28



1                   335) Plaintiff Ryan Kreisberg resides in Arizona, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about January 2010 and continuing through the end of April 2014 and thereafter.

4                   336) Plaintiff Alexandra Kurtz resides in California, had a GAFE  
5 account through the University of California, Santa Cruz, and used it to send and receive  
6 email starting in or about November 2011 and continuing through June 2013.

7                   337) Plaintiff Brian Kurtz resides in Michigan, had a GAFE account  
8 through the University of Michigan, and used it to send and receive email starting in or  
9 about March 2013 and continuing through the end of April 2014 and thereafter.

10                  338) Plaintiff Rhonda La Grande resides in California, had a GAFE  
11 account through the University of California, Berkeley, and used it to send and receive  
12 email starting in or about November 2012 and continuing through the end of April 2014  
13 and thereafter.

14                  339) Plaintiff Rosemary La Grua resides in California, had a GAFE  
15 account through the Rhode Island School of Design, and used it to send and receive email  
16 starting in or about January 2011 and continuing through May 2011.

17                  340) Plaintiff Antonio Lamv resides in California, had a GAFE account  
18 through the University of California, Santa Cruz, and used it to send and receive email  
19 starting in or about October 2013 and continuing through the end of April 2014 and  
20 thereafter.

21                  341) Plaintiff Justas Lauzadis resides in New York, had a GAFE account  
22 through the State University of New York at Stony Brook, and used it to send and receive  
23 email starting in or about January 2013 and continuing through the end of April 2014 and  
24 thereafter.

25                  342) Plaintiff Nathan Lawson resides in Maryland, had a GAFE account  
26 through the Rhode Island School of Design, and used it to send and receive email starting  
27 in or about September 2011 and continuing through the end of April 2014 and thereafter.  
28

1                   343) Plaintiff Evan Layman resides in California, had a GAFE account  
2 through the University of California, Berkeley, and used it to send and receive email  
3 starting in or about November 2012 and continuing through May 2013.

4                   344) Plaintiff Cassandra Leasure resides in California, had a GAFE  
5 account through the University of California, Berkeley, and used it to send and receive  
6 email starting in or about November 2012 and continuing through the end of April 2014  
7 and thereafter.

8                   345) Plaintiff Daniel Lecours resides in Michigan, had a GAFE account  
9 through the University of Michigan, and used it to send and receive email starting in or  
10 about October 2012 and continuing through the end of April 2014 and thereafter.

11                   346) Plaintiff Bryan Leddy resides in North Carolina, had a GAFE  
12 account through Virginia Tech, and used it to send and receive email starting in or about  
13 December 2012 and continuing through May 2013.

14                   347) Plaintiff Jennifer Lee-Yuen resides in California, had a GAFE  
15 account through the University of California, Santa Cruz, and used it to send and receive  
16 email starting in or about September 2013 and continuing through the end of April 2014  
17 and thereafter.

18                   348) Plaintiff Joanne Lee-Yuen resides in California, had a GAFE  
19 account through the University of California, Santa Cruz, and used it to send and receive  
20 email starting in or about November 2011 and continuing through the end of April 2014  
21 and thereafter.

22                   349) Plaintiff Josh Lehga resides in California, had a GAFE account  
23 through the University of California, Berkeley, and used it to send and receive email  
24 starting in or about November 2012 and continuing through the end of April 2014 and  
25 thereafter.  
26  
27  
28

1                   350) Plaintiff Adam Leotta resides in California, had a GAFE account  
2 through New York University, and used it to send and receive email starting in or about  
3 May 2011 and continuing through December 2011.

4                   351) Plaintiff Benjamin Lesea-Pringle resides in California, had a GAFE  
5 account through the University of California, Santa Cruz, and used it to send and receive  
6 email starting in or about November 2011 and continuing through June 2011.

7                   352) Plaintiff Martha Letchinger resides in California, had a GAFE  
8 account through the University of California, Santa Cruz, and used it to send and receive  
9 email starting in or about November 2011 and continuing through the end of April 2014  
10 and thereafter.

11                   353) Plaintiff Shannon Levis resides in California, had a GAFE account  
12 through the University of California, Berkeley, and used it to send and receive email  
13 starting in or about November 2012 and continuing through the end of April 2014 and  
14 thereafter.

15                   354) Plaintiff Daniel Lewis resides in California, had a GAFE account  
16 through the University of California, Santa Cruz, and used it to send and receive email  
17 starting in or about November 2011 and continuing through the end of April 2014 and  
18 thereafter.

19                   355) Plaintiff Joseph Lewis resides in Pennsylvania, had a GAFE  
20 account through Boston University, and used it to send and receive email starting in or  
21 about January 2014 and continuing through the end of April 2014 and thereafter.

22                   356) Plaintiff Erica Leyva Arenas resides in California, had a GAFE  
23 account through the University of California, Santa Cruz, and used it to send and receive  
24 email starting in or about September 2012 and continuing through the end of April 2014  
25 and thereafter.  
26  
27  
28

1                   357) Plaintiff Helen Li resides in Illinois, had a GAFE account through  
2 Northwestern University, and used it to send and receive email starting in or about  
3 September 2010 and continuing through March 2014.

4                   358) Plaintiff Michael Li resides in Massachusetts, had a GAFE account  
5 through Boston University, and used it to send and receive email starting in or about  
6 September 2012 and continuing through the end of April 2014 and thereafter.

7                   359) Plaintiff Chelsea Liebowitz resides in Michigan, had a GAFE  
8 account through the University of Michigan, and used it to send and receive email starting  
9 in or about October 2012 and continuing through the end of April 2014 and thereafter.

10                  360) Plaintiff Anthony Lim resides in California, had a GAFE account  
11 through the University of California, Santa Cruz, and used it to send and receive email  
12 starting in or about November 2011 and continuing through the end of April 2014 and  
13 thereafter.

14                  361) Plaintiff Danielle Littman resides in Illinois, had a GAFE account  
15 through Northwestern University, and used it to send and receive email starting in or  
16 about September 2009 and continuing through June 2013.

17                  362) Plaintiff David Liu resides in Connecticut, had a GAFE account  
18 through Yale University, and used it to send and receive email starting in or about August  
19 2013 and continuing through the end of April 2014 and thereafter.

20                  363) Plaintiff Joshua Liu resides in California, had a GAFE account  
21 through the University of California, Santa Cruz, and used it to send and receive email  
22 starting in or about November 2011 and continuing through January 2013.

23                  364) Plaintiff Athena Lo resides in New York, had a GAFE account  
24 through the Rhode Island School of Design, and used it to send and receive email starting  
25 in or about January 2011 and continuing through June 2012.

1                   365) Plaintiff Sergey Lobatch resides in New York, had a GAFE account  
2 through Brown University, and used it to send and receive email starting in or about  
3 September 2009 and continuing through May 2012.

4                   366) Plaintiff Daniel Lopez resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about September 2012 and continuing through the end of April 2014 and  
7 thereafter.

8                   367) Plaintiff David Love resides in Massachusetts, had a GAFE account  
9 through Harvard University, and used it to send and receive email starting in or about  
10 August 2011 and continuing through the end of April 2014 and thereafter.

11                   368) Plaintiff Signe Loving resides in California, had a GAFE account  
12 through the University of California, Santa Cruz, and used it to send and receive email  
13 starting in or about September 2012 and continuing through the end of April 2014 and  
14 thereafter.

15                   369) Plaintiff Janet Lu resides in New York, had a GAFE account  
16 through Harvard University, and used it to send and receive email starting in or about  
17 August 2011 and continuing through the end of April 2014 and thereafter.

18                   370) Plaintiff Eric Lujan resides in California, had a GAFE account  
19 through the University of California, Santa Cruz, and used it to send and receive email  
20 starting in or about November 2011 and continuing through the end of April 2014 and  
21 thereafter.

22                   371) Plaintiff Elias Luna resides in Arizona, had a GAFE account  
23 through the University of Arizona, and used it to send and receive email starting in or  
24 about June 2012 and continuing through the end of April 2014 and thereafter.

25                   372) Plaintiff Xinjie Luo resides in New York, had a GAFE account  
26 through New York University, and used it to send and receive email starting in or about  
27 August 2011 and continuing through the end of April 2014 and thereafter.  
28

1                   373) Plaintiff Matthew Lusher resides in Arizona, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about April 2013 and continuing through the end of April 2014 and thereafter.

4                   374) Plaintiff Devin Lynch resides in New Jersey, had a GAFE account  
5 through New York University, and used it to send and receive email starting in or about  
6 September 2011 and continuing through the end of April 2014 and thereafter.

7                   375) Plaintiff Sean Lyness resides in Rhode Island, had a GAFE account  
8 through Brown University, and used it to send and receive email starting in or about  
9 September 2009 and continuing through May 2012.

10                  376) Plaintiff Casimir Lyszczyk resides in Illinois, had a GAFE  
11 account through Northwestern University, and used it to send and receive email starting in  
12 or about August 2010 and continuing through June 2013.

13                  377) Plaintiff Benjamin Mabie resides in California, had a GAFE  
14 account through the University of California, Santa Cruz, and used it to send and receive  
15 email starting in or about November 2011 and continuing through the end of April 2014  
16 and thereafter.

17                  378) Plaintiff Steven Mach resides in New York, had a GAFE account  
18 through Virginia Tech, and used it to send and receive email starting in or about  
19 December 2012 and continuing through the end of April 2014 and thereafter.

20                  379) Plaintiff Carleigh Madden resides in California, had a GAFE  
21 account through Boston University, and used it to send and receive email starting in or  
22 about September 2012 and continuing through the end of April 2014 and thereafter.

23                  380) Plaintiff Colin Madrid resides in Arizona, had a GAFE account  
24 through the University of Arizona, and used it to send and receive email starting in or  
25 about August 2011 and continuing through the end of April 2014 and thereafter.  
26  
27  
28

1                   381) Plaintiff William Major resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about November 2011 and continuing through April 2012.

4                   382) Plaintiff Hin Mak resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about November 2011 and continuing through June 2012.

7                   383) Plaintiff Mihailo Malowany resides in Canada, had a GAFE  
8 account through Harvard University, and used it to send and receive email starting in or  
9 about August 2011 and continuing through May 2013.

10                  384) Plaintiff Henry Manes resides in California, had a GAFE account  
11 through the University of California, Berkeley, and used it to send and receive email  
12 starting in or about November 2012 and continuing through the end of April 2014 and  
13 thereafter.

14                  385) Plaintiff Emily Martin resides in Illinois, had a GAFE account  
15 through the University of Arizona, and used it to send and receive email starting in or  
16 about January 2010 and continuing through December 2012.

17                  386) Plaintiff Sean Martin resides in Connecticut, had a GAFE account  
18 through the University of Connecticut, and used it to send and receive email starting in or  
19 about December 2012 and continuing through the end of April 2014 and thereafter.

20                  387) Plaintiff Paul Martino resides in New York, had a GAFE account  
21 through Brown University, and used it to send and receive email starting in or about May  
22 2013 and continuing through the end of April 2014 and thereafter.

23                  388) Plaintiff Megan Martucci resides in New Hampshire, had a GAFE  
24 account through New York University, and used it to send and receive email starting in or  
25 about May 2011 and continuing through May 2013.

26                  389) Plaintiff Derek Marx resides in California, had a GAFE account  
27 through the University of California, Santa Cruz, and used it to send and receive email  
28

1 starting in or about August 2013 and continuing through the end of April 2014 and  
2 thereafter.

3 390) Plaintiff Alexander Matzat resides in California, had a GAFE  
4 account through the University of California, Santa Cruz, and used it to send and receive  
5 email starting in or about September 2012 and continuing through the end of April 2014  
6 and thereafter.

7 391) Plaintiff Thomas Mccann resides in Illinois, had a GAFE account  
8 through the University of California, Berkeley, and used it to send and receive email  
9 starting in or about June 2013 and continuing through the end of April 2014 and  
10 thereafter.

11 392) Plaintiff Amanda Mcclintock resides in Illinois, had a GAFE  
12 account through Northwestern University, and used it to send and receive email starting in  
13 or about June 2011 and continuing through the end of April 2014 and thereafter.

14 393) Plaintiff Charles Mcdonald resides in New York, had a GAFE  
15 account through Yale University, and used it to send and receive email starting in or about  
16 October 2012 and continuing through the end of April 2014 and thereafter.

17 394) Plaintiff Asher Mcguffin resides in Massachusetts, had a GAFE  
18 account through Boston University, and used it to send and receive email starting in or  
19 about September 2013 and continuing through the end of April 2014 and thereafter.

20 395) Plaintiff Tracelyn Mcguire resides in Hawaii, had a GAFE account  
21 through the University of Hawaii, and used it to send and receive email starting in or  
22 about December 2011 and continuing through the end of April 2014 and thereafter.

23 396) Plaintiff Kevin Mckeown resides in Florida, had a GAFE account  
24 through the University of Maine, and used it to send and receive email starting in or about  
25 June 2009 and continuing through May 2012.



1                   397) Plaintiff Ryan Mckeown resides in Massachusetts, had a GAFE  
2 account through Brown University, and used it to send and receive email starting in or  
3 about September 2010 and continuing through the end of April 2014 and thereafter.

4                   398) Plaintiff Joseph Mcmanus resides in Arizona, had a GAFE account  
5 through the University of Arizona, and used it to send and receive email starting in or  
6 about September 2010 and continuing through the end of April 2014 and thereafter.

7                   399) Plaintiff Jean-luc Mcmurtry resides in New York, had a GAFE  
8 account through New York University, and used it to send and receive email starting in or  
9 about August 2012 and continuing through the end of April 2014 and thereafter.

10                  400) Plaintiff Taryn McPherson resides in New York, had a GAFE  
11 account through New York University, and used it to send and receive email starting in or  
12 about August 2011 and continuing through the end of April 2014 and thereafter.

13                  401) Plaintiff Jason McQuade resides in Massachusetts, had a GAFE  
14 account through Boston University, and used it to send and receive email starting in or  
15 about September 2011 and continuing through the end of April 2014 and thereafter.

16                  402) Plaintiff Tyler Meacham resides in Arizona, had a GAFE account  
17 through the University of Arizona, and used it to send and receive email starting in or  
18 about August 2011 and continuing through the end of April 2014 and thereafter.

19                  403) Plaintiff William Mebane resides in Arizona, had a GAFE account  
20 through the University of Arizona, and used it to send and receive email starting in or  
21 about August 2011 and continuing through the end of April 2014 and thereafter.

22                  404) Plaintiff Alyssa Mehl resides in Washington, had a GAFE account  
23 through Pacific Lutheran University, and used it to send and receive email starting in or  
24 about July 2009 and continuing through May 2011.

25                  405) Plaintiff Ricardo Melgoza resides in California, had a GAFE  
26 account through the University of California, Santa Cruz, and used it to send and receive  
27 email starting in or about November 2011 and continuing through June 2013.  
28

1                   406) Plaintiff Kyle Mendenhall resides in California, had a GAFE  
2 account through the University of California, Santa Cruz, and used it to send and receive  
3 email starting in or about November 2011 and continuing through the end of April 2014  
4 and thereafter.

5                   407) Plaintiff Ignacio Mendez-Nunez resides in California, had a GAFE  
6 account through the University of California, Berkeley, and used it to send and receive  
7 email starting in or about November 2012 and continuing through the end of April 2014  
8 and thereafter.

9                   408) Plaintiff Alvaro Mendizabal resides in California, had a GAFE  
10 account through the University of California, Santa Cruz, and used it to send and receive  
11 email starting in or about September 2013 and continuing through the end of April 2014  
12 and thereafter.

13                  409) Plaintiff Aaron Metviner resides in Georgia, had a GAFE account  
14 through the University of Michigan, and used it to send and receive email starting in or  
15 about October 2012 and continuing through May 2013.

16                  410) Plaintiff Todd Michael resides in California, had a GAFE account  
17 through the University of California, Santa Cruz, and used it to send and receive email  
18 starting in or about November 2011 and continuing through August 2012.

19                  411) Plaintiff Ericka Michal resides in Washington, had a GAFE account  
20 through Pacific Lutheran University, and used it to send and receive email starting in or  
21 about September 2010 and continuing through the end of April 2014 and thereafter.

22                  412) Plaintiff Amy Miller resides in Wisconsin, had a GAFE account  
23 through Northwestern University, and used it to send and receive email starting in or  
24 about May 2012 and continuing through May 2013.

25                  413) Plaintiff Joseph Miller resides in California, had a GAFE account  
26 through the University of California, Santa Cruz, and used it to send and receive email  
27  
28

1 starting in or about June 2013 and continuing through the end of April 2014 and  
2 thereafter.

3 414) Plaintiff Winn Miller resides in California, had a GAFE account  
4 through the University of California, Santa Cruz, and used it to send and receive email  
5 starting in or about August 2012 and continuing through the end of April 2014 and  
6 thereafter.

7 415) Plaintiff Ryan Millman resides in New York, had a GAFE account  
8 through New York University, and used it to send and receive email starting in or about  
9 September 2012 and continuing through the end of April 2014 and thereafter.

10 416) Plaintiff Amanda Mitchell resides in California, had a GAFE  
11 account through the University of California, Santa Cruz, and used it to send and receive  
12 email starting in or about September 2013 and continuing through the end of April 2014  
13 and thereafter.

14 417) Plaintiff Nikki Modiri resides in California, had a GAFE account  
15 through the University of California, Santa Cruz, and used it to send and receive email  
16 starting in or about November 2011 and continuing through June 2011, as well as a GAFE  
17 account through the University of California, Berkeley, and used it to send and receive  
18 email starting in or about November 2012 and continuing through the end of April 2014  
19 and thereafter.

20 418) Plaintiff Keyhan Moini resides in California, had a GAFE account  
21 through the University of California, Santa Cruz, and used it to send and receive email  
22 starting in or about November 2011 and continuing through June 2013.

23 419) Plaintiff Richard Mojica resides in California, had a GAFE account  
24 through the University of California, Berkeley, and used it to send and receive email  
25 starting in or about January 2013 and continuing through the end of April 2014 and  
26 thereafter.

1                   420) Plaintiff Nicholas Mokover resides in California, had a GAFE  
2 account through the University of California, Santa Cruz, and used it to send and receive  
3 email starting in or about November 2011 and continuing through March 2013.

4                   421) Plaintiff Matthew Molzahn resides in California, had a GAFE  
5 account through the University of California, Santa Cruz, and used it to send and receive  
6 email starting in or about November 2011 and continuing through the end of April 2014  
7 and thereafter.

8                   422) Plaintiff Aleesa Monaco resides in Arizona, had a GAFE account  
9 through the University of Arizona, and used it to send and receive email starting in or  
10 about August 2011 and continuing through May 2012.

11                   423) Plaintiff Edgar Mondragon resides in California, had a GAFE  
12 account through the University of California, Berkeley, and used it to send and receive  
13 email starting in or about November 2012 and continuing through June 2013.

14                   424) Plaintiff Elizabeth Mooney resides in New York, had a GAFE  
15 account through the Rhode Island School of Design, and used it to send and receive email  
16 starting in or about January 2011 and continuing through June 2012.

17                   425) Plaintiff Cosme Morga resides in Arizona, had a GAFE account  
18 through the University of Arizona, and used it to send and receive email starting in or  
19 about August 2012 and continuing through the end of April 2014 and thereafter.

20                   426) Plaintiff Josue Morga resides in Arizona, had a GAFE account  
21 through the University of Arizona, and used it to send and receive email starting in or  
22 about August 2012 and continuing through the end of April 2014 and thereafter.

23                   427) Plaintiff Stephen Morrison resides in Michigan, had a GAFE  
24 account through Harvard University, and used it to send and receive email starting in or  
25 about August 2011 and continuing through the end of April 2014 and thereafter.

26                   428) Plaintiff Kira Moser resides in California, had a GAFE account  
27 through the University of California, Santa Cruz, and used it to send and receive email  
28

1 starting in or about November 2011 and continuing through the end of April 2014 and  
2 thereafter.

3 429) Plaintiff Gregory Mozdyniewicz resides in Arizona, had a GAFE  
4 account through the University of Arizona, and used it to send and receive email starting  
5 in or about January 2010 and continuing through May 2013.

6 430) Plaintiff Matthew Mueller resides in Washington, had a GAFE  
7 account through Pacific Lutheran University, and used it to send and receive email  
8 starting in or about July 2009 and continuing through August 2011, as well as a GAFE  
9 account through the University of Hawaii, and used it to send and receive email starting in  
10 or about August 2012 and continuing through the end of April 2014 and thereafter.

11 431) Plaintiff Zachary Mullings resides in California, had a GAFE  
12 account through the University of California, Santa Cruz, and used it to send and receive  
13 email starting in or about November 2011 and continuing through June 2012.

14 432) Plaintiff Karthik Munugala resides in Michigan, had a GAFE  
15 account through the University of Michigan, and used it to send and receive email starting  
16 in or about September 2013 and continuing through the end of April 2014 and thereafter.

17 433) Plaintiff Victor Muratalla Morales resides in Connecticut, had a  
18 GAFE account through the University of California, Berkeley, and used it to send and  
19 receive email starting in or about November 2012 and continuing through the end of April  
20 2014 and thereafter.

21 434) Plaintiff Travis Murphy resides in Pennsylvania, had a GAFE  
22 account through Virginia Tech, and used it to send and receive email starting in or about  
23 December 2012 and continuing through the end of April 2014 and thereafter.

24 435) Plaintiff Arjang Navab resides in New York, had a GAFE account  
25 through Yale University, and used it to send and receive email starting in or about October  
26 2012 and continuing through the end of April 2014 and thereafter.

1                   436) Plaintiff Alexander Nee resides in California, had a GAFE account  
2 through Northwestern University, and used it to send and receive email starting in or  
3 about September 2009 and continuing through August 2013.

4                   437) Plaintiff Spencer Neiman resides in Illinois, had a GAFE account  
5 through Northwestern University, and used it to send and receive email starting in or  
6 about September 2009 and continuing through June 2013.

7                   438) Plaintiff Gary Ngo resides in California, had a GAFE account  
8 through the University of California, Santa Cruz, and used it to send and receive email  
9 starting in or about September 2012 and continuing through the end of April 2014 and  
10 thereafter.

11                   439) Plaintiff Andrew Nguyen resides in California, had a GAFE  
12 account through the University of California, Santa Cruz, and used it to send and receive  
13 email starting in or about September 2012 and continuing through the end of April 2014  
14 and thereafter.

15                   440) Plaintiff Dustin Niblett resides in California, had a GAFE account  
16 through the University of California, Santa Cruz, and used it to send and receive email  
17 starting in or about September 2013 and continuing through the end of April 2014 and  
18 thereafter.

19                   441) Plaintiff Nicole Niebrzydowski resides in Michigan, had a GAFE  
20 account through the University of Michigan, and used it to send and receive email starting  
21 in or about October 2012 and continuing through the end of April 2014 and thereafter.

22                   442) Plaintiff Sarah Nikdel resides in New York, had a GAFE account  
23 through the Rhode Island School of Design, and used it to send and receive email starting  
24 in or about January 2011 and continuing through June 2011.

25                   443) Plaintiff Jae Seong No resides in Connecticut, had a GAFE account  
26 through Yale University, and used it to send and receive email starting in or about October  
27 2012 and continuing through the end of April 2014 and thereafter.  
28

1                   444) Plaintiff Conor O'Brien resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about November 2011 and continuing through June 2012.

4                   445) Plaintiff David O'Connell resides in Pennsylvania, had a GAFE  
5 account through Brown University, and used it to send and receive email starting in or  
6 about September 2012 and continuing through the end of April 2014 and thereafter.

7                   446) Plaintiff Christian Ogren resides in New York, had a GAFE account  
8 through New York University, and used it to send and receive email starting in or about  
9 May 2011 and continuing through May 2013.

10                  447) Plaintiff Justin O'Hare resides in North Carolina, had a GAFE  
11 account through Northwestern University, and used it to send and receive email starting in  
12 or about September 2008 and continuing through June 2012.

13                  448) Plaintiff Tim Okkema resides in Michigan, had a GAFE account  
14 through the Michigan Technological University, and used it to send and receive email  
15 starting in or about March 2012 and continuing through the end of April 2014 and  
16 thereafter.

17                  449) Plaintiff Lauren Olney resides in California, had a GAFE account  
18 through the University of California, Santa Cruz, and used it to send and receive email  
19 starting in or about November 2011 and continuing through the end of April 2014 and  
20 thereafter.

21                  450) Plaintiff Grant Olscamp resides in Ohio, had a GAFE account  
22 through Yale University, and used it to send and receive email starting in or about October  
23 2012 and continuing through the end of April 2014 and thereafter.

24                  451) Plaintiff Christine Ondris resides in California, had a GAFE  
25 account through the University of California, Santa Cruz, and used it to send and receive  
26 email starting in or about November 2011 and continuing through November 2011.  
27  
28

1                   452) Plaintiff Corey O'Neill resides in Nevada, had a GAFE account  
2 through the University of Michigan, and used it to send and receive email starting in or  
3 about October 2012 and continuing through the end of April 2014 and thereafter.

4                   453) Plaintiff Dillon Orr resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about September 2012 and continuing through the end of April 2014 and  
7 thereafter.

8                   454) Plaintiff Daniel Osorio resides in California, had a GAFE account  
9 through the University of California, Berkeley, and used it to send and receive email  
10 starting in or about November 2012 and continuing through May 2013.

11                   455) Plaintiff Zachary Ouellette resides in Massachusetts, had a GAFE  
12 account through the University of Connecticut, and used it to send and receive email  
13 starting in or about December 2012 and continuing through the end of April 2014 and  
14 thereafter.

15                   456) Plaintiff Jordan Paddock resides in California, had a GAFE account  
16 through the University of California, Santa Cruz, and used it to send and receive email  
17 starting in or about November 2011 and continuing through June 2013.

18                   457) Plaintiff Jessica Paek resides in Pennsylvania, had a GAFE account  
19 through the Rhode Island School of Design, and used it to send and receive email starting  
20 in or about January 2011 and continuing through June 2013.

21                   458) Plaintiff Kevin Park resides in New York, had a GAFE account  
22 through New York University, and used it to send and receive email starting in or about  
23 August 2013 and continuing through the end of April 2014 and thereafter.

24                   459) Plaintiff Marina Paske resides in Oregon, had a GAFE account  
25 through the University of California, Santa Cruz, and used it to send and receive email  
26 starting in or about November 2011 and continuing through September 2011.  
27  
28



1                   460) Plaintiff Sara Paull resides in Wisconsin, had a GAFE account  
2 through Brown University, and used it to send and receive email starting in or about  
3 September 2009 and continuing through May 2012.

4                   461) Plaintiff Jared Paulo resides in Arizona, had a GAFE account  
5 through the University of Arizona, and used it to send and receive email starting in or  
6 about August 2013 and continuing through the end of April 2014 and thereafter.

7                   462) Plaintiff Jasmine Pawlicki resides in Michigan, had a GAFE  
8 account through the University of Michigan, and used it to send and receive email starting  
9 in or about October 2012 and continuing through the end of April 2014 and thereafter.

10                  463) Plaintiff Lindsay Payne resides in Arizona, had a GAFE account  
11 through the University of Arizona, and used it to send and receive email starting in or  
12 about August 2010 and continuing through the end of April 2014 and thereafter.

13                  464) Plaintiff Thomas Peres resides in Texas, had a GAFE account  
14 through the University of Arizona, and used it to send and receive email starting in or  
15 about August 2010 and continuing through the end of April 2014 and thereafter.

16                  465) Plaintiff Anthony Perrotta resides in Michigan, had a GAFE  
17 account through the University of Michigan, and used it to send and receive email starting  
18 in or about October 2012 and continuing through the end of April 2014 and thereafter.

19                  466) Plaintiff Dennis Peterson resides in California, had a GAFE account  
20 through the University of California, Santa Cruz, and used it to send and receive email  
21 starting in or about November 2011 and continuing through the end of April 2014 and  
22 thereafter.

23                  467) Plaintiff Ethan Pezzolo resides in California, had a GAFE account  
24 through the University of California, Santa Cruz, and used it to send and receive email  
25 starting in or about September 2013 and continuing through the end of April 2014 and  
26 thereafter.  
27  
28

1                   468) Plaintiff Kevin Pham resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about September 2012 and continuing through the end of April 2014 and  
4 thereafter.

5                   469) Plaintiff Matthew Phillips resides in New York, had a GAFE  
6 account through Virginia Tech, and used it to send and receive email starting in or about  
7 December 2012 and continuing through the end of April 2014 and thereafter.

8                   470) Plaintiff Alyssa Picard resides in Maryland, had a GAFE account  
9 through Yale University, and used it to send and receive email starting in or about October  
10 2012 and continuing through the end of April 2014 and thereafter.

11                   471) Plaintiff Kyle Picha resides in Connecticut, had a GAFE account  
12 through Yale University, and used it to send and receive email starting in or about October  
13 2012 and continuing through the end of April 2014 and thereafter.

14                   472) Plaintiff Charles Pickard resides in Arizona, had a GAFE account  
15 through the University of Arizona, and used it to send and receive email starting in or  
16 about August 2011 and continuing through the end of April 2014 and thereafter.

17                   473) Plaintiff Nathanael Picksley resides in California, had a GAFE  
18 account through the University of California, Santa Cruz, and used it to send and receive  
19 email starting in or about September 2012 and continuing through the end of April 2014  
20 and thereafter.

21                   474) Plaintiff Irene Pinon resides in California, had a GAFE account  
22 through the University of California, Berkeley, and used it to send and receive email  
23 starting in or about November 2012 and continuing through the end of April 2014 and  
24 thereafter.

25                   475) Plaintiff Kevin Pormir resides in California, had a GAFE account  
26 through the University of California, Berkeley, and used it to send and receive email  
27 starting in or about November 2012 and continuing through May 2013.  
28

1                   476) Plaintiff Edgar Portillo resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about November 2011 and continuing through the end of April 2014 and  
4 thereafter.

5                   477) Plaintiff Jesse Posehn resides in California, had a GAFE account  
6 through Pacific Lutheran University, and used it to send and receive email starting in or  
7 about September 2011 and continuing through the end of April 2014 and thereafter.

8                   478) Plaintiff Brian Pybas resides in California, had a GAFE account  
9 through the University of California, Santa Cruz, and used it to send and receive email  
10 starting in or about November 2011 and continuing through May 2013.

11                   479) Plaintiff Stephen Racca resides in California, had a GAFE account  
12 through Brown University, and used it to send and receive email starting in or about  
13 August 2013 and continuing through the end of April 2014 and thereafter.

14                   480) Plaintiff Patricia Radis resides in California, had a GAFE account  
15 through the University of California, Berkeley, and used it to send and receive email  
16 starting in or about November 2012 and continuing through the end of April 2014 and  
17 thereafter.

18                   481) Plaintiff Shae Rafferty resides in Michigan, had a GAFE account  
19 through the University of Michigan, and used it to send and receive email starting in or  
20 about October 2012 and continuing through the end of April 2014 and thereafter.

21                   482) Plaintiff Arielle Rahmanan resides in New York, had a GAFE  
22 account through New York University, and used it to send and receive email starting in or  
23 about September 2011 and continuing through the end of April 2014 and thereafter.

24                   483) Plaintiff Laurel Rain resides in Hawaii, had a GAFE account  
25 through the University of Hawaii, and used it to send and receive email starting in or  
26 about December 2011 and continuing through the end of April 2014 and thereafter.  
27  
28

1                   484) Plaintiff Julie Rainey resides in Virginia, had a GAFE account  
2 through the State University of New York at Stony Brook, and used it to send and receive  
3 email starting in or about August 2013 and continuing through the end of April 2014 and  
4 thereafter.

5                   485) Plaintiff Jacob Rakosi resides in Georgia, had a GAFE account  
6 through Virginia Tech, and used it to send and receive email starting in or about  
7 December 2012 and continuing through the end of April 2014 and thereafter.

8                   486) Plaintiff Jay Ram resides in California, had a GAFE account  
9 through the University of California, Santa Cruz, and used it to send and receive email  
10 starting in or about November 2011 and continuing through June 2012.

11                   487) Plaintiff Steve Ramirez resides in New York, had a GAFE account  
12 through Brandeis University, and used it to send and receive email starting in or about  
13 January 2011 and continuing through May 2012.

14                   488) Plaintiff Norma Ramos resides in California, had a GAFE account  
15 through the University of California, Santa Cruz, and used it to send and receive email  
16 starting in or about September 2012 and continuing through the end of April 2014 and  
17 thereafter.

18                   489) Plaintiff Joseph Rapier resides in Texas, had a GAFE account  
19 through New York University, and used it to send and receive email starting in or about  
20 May 2012 and continuing through the end of April 2014 and thereafter.

21                   490) Plaintiff Dmitriy Rapoport resides in New York, had a GAFE  
22 account through Brown University, and used it to send and receive email starting in or  
23 about September 2009 and continuing through May 2011.

24                   491) Plaintiff Debra Ray resides in Virginia, had a GAFE account  
25 through the University of Arizona, and used it to send and receive email starting in or  
26 about January 2011 and continuing through the end of April 2014 and thereafter.  
27  
28

1                   492) Plaintiff Melanie Redd resides in Maine, had a GAFE account  
2 through the University of Maine, and used it to send and receive email starting in or about  
3 June 2010 and continuing through May 2013.

4                   493) Plaintiff Jay Reddy resides in California, had a GAFE account  
5 through the University of California, Berkeley, and used it to send and receive email  
6 starting in or about November 2012 and continuing through the end of April 2014 and  
7 thereafter.

8                   494) Plaintiff Christian Reed resides in California, had a GAFE account  
9 through the University of Arizona, and used it to send and receive email starting in or  
10 about January 2010 and continuing through May 2012.

11                   495) Plaintiff Darlene Reilley resides in Washington, had a GAFE  
12 account through Pacific Lutheran University, and used it to send and receive email  
13 starting in or about August 2012 and continuing through the end of April 2014 and  
14 thereafter.

15                   496) Plaintiff Hannah Remis resides in California, had a GAFE account  
16 through the University of California, Santa Cruz, and used it to send and receive email  
17 starting in or about November 2011 and continuing through the end of April 2014 and  
18 thereafter.

19                   497) Plaintiff Saila Reyes resides in California, had a GAFE account  
20 through New York University, and used it to send and receive email starting in or about  
21 May 2011 and continuing through the end of April 2014 and thereafter.

22                   498) Plaintiff Karen Reynaga resides in California, had a GAFE account  
23 through the University of California, Santa Cruz, and used it to send and receive email  
24 starting in or about September 2012 and continuing through the end of April 2014 and  
25 thereafter.

26                   499) Plaintiff Justin Rezende resides in Maryland, had a GAFE account  
27 through the University of California, Berkeley, and used it to send and receive email  
28

1 starting in or about August 2013 and continuing through the end of April 2014 and  
2 thereafter.

3 500) Plaintiff Joshua Rhoades resides in Arizona, had a GAFE account  
4 through the University of Arizona, and used it to send and receive email starting in or  
5 about August 2010 and continuing through the end of April 2014 and thereafter.

6 501) Plaintiff Colby Richards resides in Maine, had a GAFE account  
7 through the University of Maine, and used it to send and receive email starting in or about  
8 June 2009 and continuing through December 2013.

9 502) Plaintiff Paul Richter resides in California, had a GAFE account  
10 through the University of Michigan, and used it to send and receive email starting in or  
11 about October 2012 and continuing through May 2013.

12 503) Plaintiff Voltario Rico resides in California, had a GAFE account  
13 through the University of California, Santa Cruz, and used it to send and receive email  
14 starting in or about April 2012 and continuing through the end of April 2014 and  
15 thereafter.

16 504) Plaintiff Kellie Riggs resides in Louisiana, had a GAFE account  
17 through the Rhode Island School of Design, and used it to send and receive email starting  
18 in or about January 2011 and continuing through June 2011.

19 505) Plaintiff Eric Riley resides in Wisconsin, had a GAFE account  
20 through the University of Michigan, and used it to send and receive email starting in or  
21 about October 2012 and continuing through the end of April 2014 and thereafter.

22 506) Plaintiff Annelise Ringelman resides in California, had a GAFE  
23 account through the University of California, Santa Cruz, and used it to send and receive  
24 email starting in or about November 2011 and continuing through the end of April 2014  
25 and thereafter.  
26  
27  
28

1                   507) Plaintiff Ashley Rits resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about November 2011 and continuing through December 2013.

4                   508) Plaintiff Sarah Rittenour resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about November 2011 and continuing through June 2011.

7                   509) Plaintiff Joseph Rivera resides in Massachusetts, had a GAFE  
8 account through the University of California, Berkeley, and used it to send and receive  
9 email starting in or about November 2012 and continuing through the end of April 2014  
10 and thereafter.

11                   510) Plaintiff Michael Rivera resides in New York, had a GAFE account  
12 through New York University, and used it to send and receive email starting in or about  
13 May 2011 and continuing through January 2014.

14                   511) Plaintiff Derek Robbins resides in Michigan, had a GAFE account  
15 through the Michigan Technological University, and used it to send and receive email  
16 starting in or about March 2012 and continuing through May 2013.

17                   512) Plaintiff Kathryn Robison resides in Alabama, had a GAFE account  
18 through the University of Arizona, and used it to send and receive email starting in or  
19 about January 2010 and continuing through May 2012.

20                   513) Plaintiff Donald Rodriguez resides in Connecticut, had a GAFE  
21 account through Yale University, and used it to send and receive email starting in or about  
22 October 2012 and continuing through the end of April 2014 and thereafter.

23                   514) Plaintiff Steven Rodriguez resides in California, had a GAFE  
24 account through the University of California, Santa Cruz, and used it to send and receive  
25 email starting in or about September 2012 and continuing through the end of April 2014  
26 and thereafter.

1                   515) Plaintiff John Rogers resides in New York, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about September 2012 and continuing through the end of April 2014 and  
4 thereafter.

5                   516) Plaintiff Ryan Romain resides in Massachusetts, had a GAFE  
6 account through Harvard University, and used it to send and receive email starting in or  
7 about August 2011 and continuing through the end of April 2014 and thereafter.

8                   517) Plaintiff Benjamin Romero resides in California, had a GAFE  
9 account through the University of California, Santa Cruz, and used it to send and receive  
10 email starting in or about September 2012 and continuing through the end of April 2014  
11 and thereafter.

12                  518) Plaintiff Patrick Rooney resides in California, had a GAFE account  
13 through the University of California, Santa Cruz, and used it to send and receive email  
14 starting in or about November 2011 and continuing through March 2012.

15                  519) Plaintiff Isaac Root resides in Virginia, had a GAFE account  
16 through Virginia Tech, and used it to send and receive email starting in or about  
17 December 2012 and continuing through May 2013.

18                  520) Plaintiff Sean Roper resides in Washington, had a GAFE account  
19 through Pacific Lutheran University, and used it to send and receive email starting in or  
20 about September 2011 and continuing through December 2013.

21                  521) Plaintiff Dara Rosenkrantz resides in Tennessee, had a GAFE  
22 account through Brandeis University, and used it to send and receive email starting in or  
23 about January 2011 and continuing through May 2012.

24                  522) Plaintiff Shoshana Rosenthal resides in Colorado, had a GAFE  
25 account through Boston University, and used it to send and receive email starting in or  
26 about September 2011 and continuing through May 2012.  
27  
28



1                   523) Plaintiff Sean Ross resides in California, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about January 2010 and continuing through June 2013.

4                   524) Plaintiff Benjamin Rowan resides in Virginia, had a GAFE account  
5 through Virginia Tech, and used it to send and receive email starting in or about  
6 December 2012 and continuing through the end of April 2014 and thereafter.

7                   525) Plaintiff Christine Rowland resides in California, had a GAFE  
8 account through the University of California, Berkeley, and used it to send and receive  
9 email starting in or about November 2012 and continuing through December 2013.

10                  526) Plaintiff Michael Roy resides in Hawaii, had a GAFE account  
11 through the University of Hawaii, and used it to send and receive email starting in or  
12 about December 2011 and continuing through May 2013.

13                  527) Plaintiff Evgenia Royter resides in California, had a GAFE account  
14 through the University of California, Berkeley, and used it to send and receive email  
15 starting in or about July 2013 and continuing through the end of April 2014 and thereafter.

16                  528) Plaintiff Patrick Rubio resides in California, had a GAFE account  
17 through the University of California, Santa Cruz, and used it to send and receive email  
18 starting in or about November 2011 and continuing through June 2013.

19                  529) Plaintiff Denise Rueda resides in Illinois, had a GAFE account  
20 through the University of California, Santa Cruz, and used it to send and receive email  
21 starting in or about August 2013 and continuing through the end of April 2014 and  
22 thereafter.

23                  530) Plaintiff Kurt Ruegg resides in California, had a GAFE account  
24 through Harvard University, and used it to send and receive email starting in or about  
25 August 2011 and continuing through the end of April 2014 and thereafter.  
26  
27  
28

1                   531) Plaintiff David Ruelas resides in Arizona, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about August 2013 and continuing through the end of April 2014 and thereafter.

4                   532) Plaintiff Christopher Rutledge resides in Massachusetts, had a  
5 GAFE account through the Rhode Island School of Design, and used it to send and  
6 receive email starting in or about September 2011 and continuing through May 2013.

7                   533) Plaintiff Danielle Ryder resides in Maine, had a GAFE account  
8 through the University of Maine, and used it to send and receive email starting in or about  
9 August 2011 and continuing through the end of April 2014 and thereafter.

10                  534) Plaintiff Ardena Saarinen resides in Hawaii, had a GAFE account  
11 through the University of Hawaii, and used it to send and receive email starting in or  
12 about December 2011 and continuing through the end of April 2014 and thereafter.

13                  535) Plaintiff Robert Saeman resides in Washington, had a GAFE  
14 account through Pacific Lutheran University, and used it to send and receive email  
15 starting in or about July 2009 and continuing through June 2013.

16                  536) Plaintiff Lauren Saguilig resides in California, had a GAFE account  
17 through the University of California, Santa Cruz, and used it to send and receive email  
18 starting in or about November 2011 and continuing through June 2013.

19                  537) Plaintiff Wilfred Salas Jr. resides in Virginia, had a GAFE account  
20 through Virginia Tech, and used it to send and receive email starting in or about  
21 December 2012 and continuing through the end of April 2014 and thereafter.

22                  538) Plaintiff Nicholas Samokyszyn resides in Michigan, had a GAFE  
23 account through the Michigan Technological University, and used it to send and receive  
24 email starting in or about March 2012 and continuing through the end of April 2014 and  
25 thereafter.  
26  
27  
28

1                   539) Plaintiff Matthew Sample resides in Arizona, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about August 2013 and continuing through the end of April 2014 and thereafter.

4                   540) Plaintiff Jason Sanbei resides in California, had a GAFE account  
5 through the University of California, Berkeley, and used it to send and receive email  
6 starting in or about September 2013 and continuing through the end of April 2014 and  
7 thereafter.

8                   541) Plaintiff Carissa Sanchez resides in New Jersey, had a GAFE  
9 account through Yale University, and used it to send and receive email starting in or about  
10 October 2012 and continuing through the end of April 2014 and thereafter.

11                   542) Plaintiff Remy Sarhan resides in Michigan, had a GAFE account  
12 through the University of Michigan, and used it to send and receive email starting in or  
13 about October 2012 and continuing through May 2013.

14                   543) Plaintiff Lina Sarusal resides in Hawaii, had a GAFE account  
15 through the University of Hawaii, and used it to send and receive email starting in or  
16 about December 2011 and continuing through the end of April 2014 and thereafter.

17                   544) Plaintiff Ishita Saxena resides in Massachusetts, had a GAFE  
18 account through Boston University, and used it to send and receive email starting in or  
19 about September 2011 and continuing through May 2012.

20                   545) Plaintiff Kevin Saxman resides in Maryland, had a GAFE account  
21 through Virginia Tech, and used it to send and receive email starting in or about  
22 September 2011 and continuing through May 2012.

23                   546) Plaintiff Emily Schapka resides in Illinois, had a GAFE account  
24 through the University of Michigan, and used it to send and receive email starting in or  
25 about October 2012 and continuing through May 2013.  
26  
27  
28

1                   547) Plaintiff Jake Scheps resides in California, had a GAFE account  
2 through the University of California, Berkeley, and used it to send and receive email  
3 starting in or about November 2012 and continuing through May 2013.

4                   548) Plaintiff Christine Schmitt resides in Arizona, had a GAFE account  
5 through the University of Arizona, and used it to send and receive email starting in or  
6 about January 2010 and continuing through the end of April 2014 and thereafter.

7                   549) Plaintiff Thomas Schmitt resides in New Jersey, had a GAFE  
8 account through the Rhode Island School of Design, and used it to send and receive email  
9 starting in or about January 2011 and continuing through December 2012.

10                  550) Plaintiff Congher Schomburg resides in California, had a GAFE  
11 account through the University of California, Berkeley, and used it to send and receive  
12 email starting in or about March 2013 and continuing through the end of April 2014 and  
13 thereafter.

14                  551) Plaintiff Jack Schow resides in New York, had a GAFE account  
15 through the Rhode Island School of Design, and used it to send and receive email starting  
16 in or about January 2011 and continuing through June 2011.

17                  552) Plaintiff Thomas Schulte resides in Michigan, had a GAFE account  
18 through the University of Michigan, and used it to send and receive email starting in or  
19 about October 2012 and continuing through the end of April 2014 and thereafter.

20                  553) Plaintiff Geoff Schuyler resides in Arizona, had a GAFE account  
21 through the University of Arizona, and used it to send and receive email starting in or  
22 about August 2012 and continuing through the end of April 2014 and thereafter.

23                  554) Plaintiff Daniel Schwiebert resides in Arizona, had a GAFE  
24 account through the University of Arizona, and used it to send and receive email starting  
25 in or about January 2010 and continuing through May 2011.

26                  555) Plaintiff Myles Scolnick resides in Colorado, had a GAFE account  
27 through the University of California, Berkeley, and used it to send and receive email  
28

1 starting in or about November 2012 and continuing through the end of April 2014 and  
2 thereafter.

3 556) Plaintiff Tyler Searls resides in Michigan, had a GAFE account  
4 through the University of Michigan, and used it to send and receive email starting in or  
5 about October 2012 and continuing through the end of April 2014 and thereafter.

6 557) Plaintiff Stephanie Seibel resides in New York, had a GAFE  
7 account through the Rhode Island School of Design, and used it to send and receive email  
8 starting in or about January 2011 and continuing through June 2011.

9 558) Plaintiff Luke Sellers resides in Connecticut, had a GAFE account  
10 through Yale University, and used it to send and receive email starting in or about August  
11 2013 and continuing through the end of April 2014 and thereafter.

12 559) Plaintiff Matthew Shaffer resides in Arizona, had a GAFE account  
13 through the University of Arizona, and used it to send and receive email starting in or  
14 about August 2013 and continuing through the end of April 2014 and thereafter.

15 560) Plaintiff Samir Shah resides in Arizona, had a GAFE account  
16 through the University of Arizona, and used it to send and receive email starting in or  
17 about August 2012 and continuing through the end of April 2014 and thereafter.

18 561) Plaintiff Tyler Sherer resides in California, had a GAFE account  
19 through San Diego State University, and used it to send and receive email starting in or  
20 about October 2011 and continuing through January 2013.

21 562) Plaintiff David Sherman resides in Massachusetts, had a GAFE  
22 account through Brandeis University, and used it to send and receive email starting in or  
23 about January 2011 and continuing through the end of April 2014 and thereafter.

24 563) Plaintiff Monica Sherwood resides in California, had a GAFE  
25 account through the University of California, Santa Cruz, and used it to send and receive  
26 email starting in or about November 2011 and continuing through August 2013.  
27  
28

1                   564) Plaintiff Kevin Shih resides in Michigan, had a GAFE account  
2 through Northwestern University, and used it to send and receive email starting in or  
3 about September 2009 and continuing through June 2012.

4                   565) Plaintiff Reed Showalter resides in Illinois, had a GAFE account  
5 through New York University, and used it to send and receive email starting in or about  
6 August 2011 and continuing through the end of April 2014 and thereafter.

7                   566) Plaintiff Daniel Shubat resides in California, had a GAFE account  
8 through the University of California, Santa Cruz, and used it to send and receive email  
9 starting in or about November 2011 and continuing through the end of April 2014 and  
10 thereafter.

11                   567) Plaintiff Yevgeniy Shuster resides in California, had a GAFE  
12 account through the University of California, Berkeley, and used it to send and receive  
13 email starting in or about November 2012 and continuing through the end of April 2014  
14 and thereafter.

15                   568) Plaintiff Brent Sievers resides in California, had a GAFE account  
16 through the Rhode Island School of Design, and used it to send and receive email starting  
17 in or about January 2011 and continuing through the end of April 2014 and thereafter.

18                   569) Plaintiff Erica Siu resides in California, had a GAFE account  
19 through the University of California, Santa Cruz, and used it to send and receive email  
20 starting in or about November 2011 and continuing through the end of April 2014 and  
21 thereafter.

22                   570) Plaintiff David Skarbowski resides in Florida, had a GAFE account  
23 through Virginia Tech, and used it to send and receive email starting in or about  
24 December 2012 and continuing through the end of April 2014 and thereafter.

25                   571) Plaintiff Brian Skillings resides in Arizona, had a GAFE account  
26 through New York University, and used it to send and receive email starting in or about  
27 September 2013 and continuing through the end of April 2014 and thereafter.  
28

1                   572) Plaintiff Matthew Slovin resides in Ohio, had a GAFE account  
2 through the University of Michigan, and used it to send and receive email starting in or  
3 about October 2012 and continuing through the end of April 2014 and thereafter.

4                   573) Plaintiff Joseph Smeeding resides in Wisconsin, had a GAFE  
5 account through the University of Arizona, and used it to send and receive email starting  
6 in or about August 2013 and continuing through the end of April 2014 and thereafter.

7                   574) Plaintiff Andrew Smith resides in Pennsylvania, had a GAFE  
8 account through Brown University, and used it to send and receive email starting in or  
9 about September 2009 and continuing through the end of April 2014 and thereafter.

10                  575) Plaintiff Brittany Smith resides in Pennsylvania, had a GAFE  
11 account through the University of California, Santa Cruz, and used it to send and receive  
12 email starting in or about November 2011 and continuing through the end of April 2014  
13 and thereafter.

14                  576) Plaintiff Harrison Smith resides in Massachusetts, had a GAFE  
15 account through Boston University, and used it to send and receive email starting in or  
16 about September 2011 and continuing through the end of April 2014 and thereafter.

17                  577) Plaintiff Jordan Smith resides in California, had a GAFE account  
18 through the University of California, Santa Cruz, and used it to send and receive email  
19 starting in or about September 2012 and continuing through the end of April 2014 and  
20 thereafter.

21                  578) Plaintiff Morgan Smith resides in California, had a GAFE account  
22 through the University of California, Santa Cruz, and used it to send and receive email  
23 starting in or about September 2013 and continuing through the end of April 2014 and  
24 thereafter.

25                  579) Plaintiff Richard Smith resides in California, had a GAFE account  
26 through the University of California, Santa Cruz, and used it to send and receive email  
27  
28

1 starting in or about November 2011 and continuing through the end of April 2014 and  
2 thereafter.

3 580) Plaintiff Sophia Smith resides in California, had a GAFE account  
4 through the University of California, Santa Cruz, and used it to send and receive email  
5 starting in or about November 2011 and continuing through the end of April 2014 and  
6 thereafter.

7 581) Plaintiff Justin Sola resides in Massachusetts, had a GAFE account  
8 through Harvard University, and used it to send and receive email starting in or about  
9 August 2011 and continuing through the end of April 2014 and thereafter.

10 582) Plaintiff Michael Solotke resides in Illinois, had a GAFE account  
11 through Yale University, and used it to send and receive email starting in or about October  
12 2012 and continuing through May 2013.

13 583) Plaintiff Lewis Solow-Collins resides in California, had a GAFE  
14 account through Brandeis University, and used it to send and receive email starting in or  
15 about January 2011 and continuing through the end of April 2014 and thereafter.

16 584) Plaintiff Miles Sorel resides in California, had a GAFE account  
17 through the University of California, Santa Cruz, and used it to send and receive email  
18 starting in or about November 2011 and continuing through the end of April 2014 and  
19 thereafter.

20 585) Plaintiff Craig Sotebeer resides in Washington, had a GAFE  
21 account through Pacific Lutheran University, and used it to send and receive email  
22 starting in or about September 2011 and continuing through March 2013.

23 586) Plaintiff Matt Sportini resides in Connecticut, had a GAFE account  
24 through the University of Connecticut, and used it to send and receive email starting in or  
25 about December 2012 and continuing through the end of April 2014 and thereafter.  
26  
27  
28



1                   587) Plaintiff Sean Stalhandske resides in Michigan, had a GAFE  
2 account through the University of Michigan, and used it to send and receive email starting  
3 in or about October 2012 and continuing through the end of April 2014 and thereafter.

4                   588) Plaintiff Zachary Stampelis resides in Michigan, had a GAFE  
5 account through the University of Michigan, and used it to send and receive email starting  
6 in or about October 2012 and continuing through the end of April 2014 and thereafter.

7                   589) Plaintiff Jeff Stark resides in California, had a GAFE account  
8 through the University of Arizona, and used it to send and receive email starting in or  
9 about August 2010 and continuing through the end of April 2014 and thereafter.

10                  590) Plaintiff Tomasz Stawicki resides in Arizona, had a GAFE account  
11 through the University of Arizona, and used it to send and receive email starting in or  
12 about August 2011 and continuing through the end of April 2014 and thereafter.

13                  591) Plaintiff Holly Stehlin resides in Illinois, had a GAFE account  
14 through the University of Michigan, and used it to send and receive email starting in or  
15 about October 2012 and continuing through May 2013.

16                  592) Plaintiff Jeffrey Stephens resides in California, had a GAFE  
17 account through the University of California, Santa Cruz, and used it to send and receive  
18 email starting in or about November 2011 and continuing through June 2013.

19                  593) Plaintiff Alexadner Stoffel resides in California, had a GAFE  
20 account through the University of California, Santa Cruz, and used it to send and receive  
21 email starting in or about November 2011 and continuing through the end of April 2014  
22 and thereafter.

23                  594) Plaintiff Richard Stofle resides in California, had a GAFE account  
24 through the University of California, Berkeley, and used it to send and receive email  
25 starting in or about November 2012 and continuing through the end of April 2014 and  
26 thereafter.  
27  
28

1                   595) Plaintiff Joshua Storms resides in Virginia, had a GAFE account  
2 through Virginia Tech, and used it to send and receive email starting in or about  
3 December 2012 and continuing through May 2013.

4                   596) Plaintiff Rory Strahan-Mauk resides in Illinois, had a GAFE  
5 account through the University of California, Santa Cruz, and used it to send and receive  
6 email starting in or about November 2011 and continuing through June 2012.

7                   597) Plaintiff Ryan Strauss resides in Hong Kong, had a GAFE account  
8 through the University of Arizona, and used it to send and receive email starting in or  
9 about January 2010 and continuing through May 2012.

10                  598) Plaintiff Gregory Stuck resides in California, had a GAFE account  
11 through the University of California, Berkeley, and used it to send and receive email  
12 starting in or about November 2012 and continuing through May 2013.

13                  599) Plaintiff Emilie Stuebe resides in California, had a GAFE account  
14 through the University of California, Santa Cruz, and used it to send and receive email  
15 starting in or about June 2012 and continuing through the end of April 2014 and  
16 thereafter.

17                  600) Plaintiff Tala Sullivan resides in California, had a GAFE account  
18 through the University of California, Santa Cruz, and used it to send and receive email  
19 starting in or about September 2012 and continuing through the end of April 2014 and  
20 thereafter.

21                  601) Plaintiff Sebastian Swae-Shampine resides in Michigan, had a  
22 GAFE account through the University of Michigan, and used it to send and receive email  
23 starting in or about October 2012 and continuing through the end of April 2014 and  
24 thereafter.

25                  602) Plaintiff Ryan Swearingen resides in Oregon, had a GAFE account  
26 through the University of Arizona, and used it to send and receive email starting in or  
27 about January 2010 and continuing through May 2012.  
28

1                   603) Plaintiff Cristina Swift resides in California, had a GAFE account  
2 through the University of California, Berkeley, and used it to send and receive email  
3 starting in or about November 2012 and continuing through the end of April 2014 and  
4 thereafter.

5                   604) Plaintiff Deborah Tackett resides in Michigan, had a GAFE account  
6 through the University of Michigan, and used it to send and receive email starting in or  
7 about October 2012 and continuing through the end of April 2014 and thereafter.

8                   605) Plaintiff Rex Tai resides in Illinois, had a GAFE account through  
9 Northwestern University, and used it to send and receive email starting in or about  
10 September 2011 and continuing through the end of April 2014 and thereafter.

11                   606) Plaintiff Vanessa Tait resides in California, had a GAFE account  
12 through the University of California, Berkeley, and used it to send and receive email  
13 starting in or about January 2013 and continuing through the end of April 2014 and  
14 thereafter.

15                   607) Plaintiff Samuel Tall resides in New York, had a GAFE account  
16 through New York University, and used it to send and receive email starting in or about  
17 May 2011 and continuing through December 2013.

18                   608) Plaintiff Kristian Talley resides in Idaho, had a GAFE account  
19 through the University of California, Santa Cruz, and used it to send and receive email  
20 starting in or about November 2011 and continuing through the end of April 2014 and  
21 thereafter.

22                   609) Plaintiff Kevin Tan resides in New Jersey, had a GAFE account  
23 through the University of Michigan, and used it to send and receive email starting in or  
24 about October 2012 and continuing through the end of April 2014 and thereafter.

25                   610) Plaintiff Tammy Tan resides in California, had a GAFE account  
26 through the Rhode Island School of Design, and used it to send and receive email starting  
27 in or about January 2011 and continuing through the end of April 2014 and thereafter.  
28

1                   611) Plaintiff Ronald Tardiff resides in Connecticut, had a GAFE  
2 account through the University of Connecticut, and used it to send and receive email  
3 starting in or about December 2012 and continuing through the end of April 2014 and  
4 thereafter.

5                   612) Plaintiff Meighan Taylor resides in Arizona, had a GAFE account  
6 through the University of Arizona, and used it to send and receive email starting in or  
7 about August 2013 and continuing through the end of April 2014 and thereafter.

8                   613) Plaintiff Brian Teed resides in Massachusetts, had a GAFE account  
9 through Boston University, and used it to send and receive email starting in or about  
10 September 2012 and continuing through the end of April 2014 and thereafter.

11                   614) Plaintiff Etienne Thach resides in California, had a GAFE account  
12 through the University of California, Santa Cruz, and used it to send and receive email  
13 starting in or about September 2013 and continuing through the end of April 2014 and  
14 thereafter.

15                   615) Plaintiff Robert Thomas resides in Michigan, had a GAFE account  
16 through the University of Michigan, and used it to send and receive email starting in or  
17 about October 2012 and continuing through the end of April 2014 and thereafter.

18                   616) Plaintiff Kayla Thompson resides in Michigan, had a GAFE  
19 account through the University of Michigan, and used it to send and receive email starting  
20 in or about October 2012 and continuing through May 2013.

21                   617) Plaintiff Roy Thompson resides in Hawaii, had a GAFE account  
22 through the University of Hawaii, and used it to send and receive email starting in or  
23 about December 2011 and continuing through the end of April 2014 and thereafter.

24                   618) Plaintiff Wyatt Thurston resides in California, had a GAFE account  
25 through the University of Arizona, and used it to send and receive email starting in or  
26 about August 2010 and continuing through the end of April 2014 and thereafter.  
27  
28

1                   619) Plaintiff Robert Thyberg resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about November 2011 and continuing through the end of April 2014 and  
4 thereafter.

5                   620) Plaintiff Steven Timlin resides in Arizona, had a GAFE account  
6 through the University of Arizona, and used it to send and receive email starting in or  
7 about January 2010 and continuing through August 2013.

8                   621) Plaintiff Joanna Titus resides in Arizona, had a GAFE account  
9 through the University of Arizona, and used it to send and receive email starting in or  
10 about January 2010 and continuing through June 2012.

11                   622) Plaintiff Chezare Torres resides in Hawaii, had a GAFE account  
12 through the University of Hawaii, and used it to send and receive email starting in or  
13 about December 2011 and continuing through the end of April 2014 and thereafter.

14                   623) Plaintiff Samuel Torres resides in New York, had a GAFE account  
15 through Brown University, and used it to send and receive email starting in or about  
16 August 2011 and continuing through the end of April 2014 and thereafter.

17                   624) Plaintiff Maria Torruella Suarez resides in North Carolina, had a  
18 GAFE account through Yale University, and used it to send and receive email starting in  
19 or about October 2012 and continuing through the end of April 2014 and thereafter.

20                   625) Plaintiff Katrina tosh resides in California, had a GAFE account  
21 through the University of California, Santa Cruz, and used it to send and receive email  
22 starting in or about November 2011 and continuing through the end of April 2014 and  
23 thereafter.

24                   626) Plaintiff Cody Trevillian resides in Michigan, had a GAFE account  
25 through the Michigan Technological University, and used it to send and receive email  
26 starting in or about March 2012 and continuing through the end of April 2014 and  
27 thereafter.  
28

1                   627) Plaintiff Andrew Trevino resides in California, had a GAFE  
2 account through the University of California, Berkeley, and used it to send and receive  
3 email starting in or about November 2012 and continuing through May 2013.

4                   628) Plaintiff Kailey-alyssa Tucker resides in Colorado, had a GAFE  
5 account through the University of Arizona, and used it to send and receive email starting  
6 in or about January 2010 and continuing through December 2013.

7                   629) Plaintiff Melody Tuttle resides in Illinois, had a GAFE account  
8 through the Rhode Island School of Design, and used it to send and receive email starting  
9 in or about January 2011 and continuing through May 2011.

10                  630) Plaintiff Symeon Tzvetkov resides in California, had a GAFE  
11 account through the University of California, Santa Cruz, and used it to send and receive  
12 email starting in or about November 2011 and continuing through the end of April 2014  
13 and thereafter.

14                  631) Plaintiff Kimberly Vadelnieks resides in California, had a GAFE  
15 account through the University of California, Santa Cruz, and used it to send and receive  
16 email starting in or about November 2011 and continuing through the end of April 2014  
17 and thereafter.

18                  632) Plaintiff Desiree Valadez resides in California, had a GAFE  
19 account through San Diego State University, and used it to send and receive email starting  
20 in or about October 2011 and continuing through the end of April 2014 and thereafter.

21                  633) Plaintiff Karina Valencia resides in California, had a GAFE account  
22 through the University of California, Santa Cruz, and used it to send and receive email  
23 starting in or about September 2012 and continuing through the end of April 2014 and  
24 thereafter.

25                  634) Plaintiff Anthony Valente resides in Washington, D.C., had a  
26 GAFE account through Northwestern University, and used it to send and receive email  
27 starting in or about January 2008 and continuing through June 2011.  
28

1                   635) Plaintiff Jonathan Van Ness resides in Arizona, had a GAFE  
2 account through the University of Michigan, and used it to send and receive email starting  
3 in or about October 2012 and continuing through the end of April 2014 and thereafter.

4                   636) Plaintiff Amber Vandever (Schlecht) resides in Washington, had a  
5 GAFE account through Pacific Lutheran University, and used it to send and receive email  
6 starting in or about September 2012 and continuing through the end of April 2014 and  
7 thereafter.

8                   637) Plaintiff Tamara Varga resides in Arizona, had a GAFE account  
9 through the University of Arizona, and used it to send and receive email starting in or  
10 about January 2010 and continuing through May 2012.

11                   638) Plaintiff Polly Varize resides in Hawaii, had a GAFE account  
12 through the University of Hawaii, and used it to send and receive email starting in or  
13 about April 2012 and continuing through December 2013.

14                   639) Plaintiff Zachary Vary resides in New York, had a GAFE account  
15 through New York University, and used it to send and receive email starting in or about  
16 May 2011 and continuing through May 2013.

17                   640) Plaintiff Diana Vega resides in California, had a GAFE account  
18 through the University of California, Santa Cruz, and used it to send and receive email  
19 starting in or about November 2011 and continuing through the end of April 2014 and  
20 thereafter.

21                   641) Plaintiff Kriya Issa Velasco resides in Washington, had a GAFE  
22 account through the University of California, Berkeley, and used it to send and receive  
23 email starting in or about November 2012 and continuing through May 2013.

24                   642) Plaintiff Samuel Velie resides in Minnesota, had a GAFE account  
25 through Northwestern University, and used it to send and receive email starting in or  
26 about September 2008 and continuing through June 2012.

1                   643) Plaintiff Quincy Venter resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about August 2013 and continuing through the end of April 2014 and  
4 thereafter.

5                   644) Plaintiff Maia Ventura resides in California, had a GAFE account  
6 through the University of California, Santa Cruz, and used it to send and receive email  
7 starting in or about November 2011 and continuing through March 2013.

8                   645) Plaintiff Pedro Venzor resides in Arizona, had a GAFE account  
9 through the University of Arizona, and used it to send and receive email starting in or  
10 about January 2010 and continuing through January 2011.

11                   646) Plaintiff Sandeep Verma resides in New Jersey, had a GAFE  
12 account through New York University, and used it to send and receive email starting in or  
13 about May 2011 and continuing through May 2012.

14                   647) Plaintiff Omar Villa resides in California, had a GAFE account  
15 through the University of California, Santa Cruz, and used it to send and receive email  
16 starting in or about November 2011 and continuing through June 2011.

17                   648) Plaintiff Nikolay Vinogradov-Nurenbeg resides in California, had  
18 a GAFE account through the University of California, Santa Cruz, and used it to send and  
19 receive email starting in or about November 2011 and continuing through August 2011.

20                   649) Plaintiff James Volz resides in California, had a GAFE account  
21 through Yale University, and used it to send and receive email starting in or about October  
22 2012 and continuing through the end of April 2014 and thereafter.

23                   650) Plaintiff June Vutrano resides in New York, had a GAFE account  
24 through New York University, and used it to send and receive email starting in or about  
25 September 2011 and continuing through the end of April 2014 and thereafter.  
26  
27  
28



1                   651) Plaintiff Maya Wagoner resides in Massachusetts, had a GAFE  
2 account through the University of California, Santa Cruz, and used it to send and receive  
3 email starting in or about November 2011 and continuing through June 2013.

4                   652) Plaintiff Robert Wainblat resides in Massachusetts, had a GAFE  
5 account through New York University, and used it to send and receive email starting in or  
6 about May 2011 and continuing through August 2011.

7                   653) Plaintiff Raymond Wang resides in California, had a GAFE account  
8 through the University of California, Santa Cruz, and used it to send and receive email  
9 starting in or about September 2011 and continuing through the end of April 2014 and  
10 thereafter.

11                   654) Plaintiff Bradford Ward resides in California, had a GAFE account  
12 through Yale University, and used it to send and receive email starting in or about October  
13 2012 and continuing through the end of April 2014 and thereafter.

14                   655) Plaintiff Jessie Watson resides in North Carolina, had a GAFE  
15 account through the University of Hawaii, and used it to send and receive email starting in  
16 or about December 2011 and continuing through July 2012.

17                   656) Plaintiff Angela Wayne resides in Arizona, had a GAFE account  
18 through the University of Arizona, and used it to send and receive email starting in or  
19 about January 2010 and continuing through December 2011.

20                   657) Plaintiff Amanda Weber resides in Hawaii, had a GAFE account  
21 through the University of Hawaii, and used it to send and receive email starting in or  
22 about December 2011 and continuing through the end of April 2014 and thereafter.

23                   658) Plaintiff Misty Weiner resides in Michigan, had a GAFE account  
24 through the Michigan Technological University, and used it to send and receive email  
25 starting in or about March 2012 and continuing through April 2013.

1                   659) Plaintiff Patrick Weinschreider resides in New York, had a GAFE  
2 account through New York University, and used it to send and receive email starting in or  
3 about May 2011 and continuing through May 2013.

4                   660) Plaintiff Jaclyn Weinstein resides in California, had a GAFE  
5 account through Brandeis University, and used it to send and receive email starting in or  
6 about January 2011 and continuing through June 2013.

7                   661) Plaintiff Vivian Wenzler resides in Rhode Island, had a GAFE  
8 account through the Rhode Island School of Design, and used it to send and receive email  
9 starting in or about January 2011 and continuing through June 2012.

10                  662) Plaintiff James Whalen resides in California, had a GAFE account  
11 through the University of California, Santa Cruz, and used it to send and receive email  
12 starting in or about November 2011 and continuing through March 2012.

13                  663) Plaintiff Chelsea Whitman resides in California, had a GAFE  
14 account through the University of California, Berkeley, and used it to send and receive  
15 email starting in or about November 2012 and continuing through May 2013.

16                  664) Plaintiff Thomas Wicker resides in Colorado, had a GAFE account  
17 through the University of Arizona, and used it to send and receive email starting in or  
18 about August 2010 and continuing through the end of April 2014 and thereafter.

19                  665) Plaintiff Nicholas Wiese resides in Virginia, had a GAFE account  
20 through Virginia Tech, and used it to send and receive email starting in or about  
21 December 2012 and continuing through May 2013.

22                  666) Plaintiff Anthony Wiggins resides in Virginia, had a GAFE account  
23 through Harvard University, and used it to send and receive email starting in or about  
24 August 2011 and continuing through the end of April 2014 and thereafter.

25                  667) Plaintiff Philip Wilkerson resides in Arizona, had a GAFE account  
26 through the University of Arizona, and used it to send and receive email starting in or  
27 about January 2010 and continuing through May 2011.  
28

1                   668) Plaintiff Christopher Wille resides in California, had a GAFE  
2 account through the University of Arizona, and used it to send and receive email starting  
3 in or about August 2010 and continuing through the end of April 2014 and thereafter.

4                   669) Plaintiff Nathaniel Williams resides in Massachusetts, had a GAFE  
5 account through the University of Maine, and used it to send and receive email starting in  
6 or about September 2009 and continuing through the end of April 2014 and thereafter.

7                   670) Plaintiff Conner Wilson resides in Colorado, had a GAFE account  
8 through the University of Arizona, and used it to send and receive email starting in or  
9 about January 2010 and continuing through May 2012.

10                  671) Plaintiff Hannah Wilson resides in Washington, had a GAFE  
11 account through Pacific Lutheran University, and used it to send and receive email  
12 starting in or about July 2009 and continuing through the end of April 2014 and thereafter.

13                  672) Plaintiff Stella Wilson-Frey resides in California, had a GAFE  
14 account through the University of California, Santa Cruz, and used it to send and receive  
15 email starting in or about November 2011 and continuing through December 2012.

16                  673) Plaintiff John Wiltse resides in Idaho, had a GAFE account through  
17 Pacific Lutheran University, and used it to send and receive email starting in or about  
18 August 2010 and continuing through May 2012.

19                  674) Plaintiff Saul Winer resides in California, had a GAFE account  
20 through the University of California, Santa Cruz, and used it to send and receive email  
21 starting in or about November 2011 and continuing through the end of April 2014 and  
22 thereafter.

23                  675) Plaintiff Casey Wing resides in Washington, had a GAFE account  
24 through the University of California, Santa Cruz, and used it to send and receive email  
25 starting in or about November 2011 and continuing through March 2014.

1                   676) Plaintiff Jacob Winkler resides in California, had a GAFE account  
2 through the University of Arizona, and used it to send and receive email starting in or  
3 about January 2010 and continuing through May 2012.

4                   677) Plaintiff Nicholas Winter resides in New Jersey, had a GAFE  
5 account through the University of California, Santa Cruz, and used it to send and receive  
6 email starting in or about November 2011 and continuing through April 2013.

7                   678) Plaintiff Maxwell Witt resides in California, had a GAFE account  
8 through the University of California, Berkeley, and used it to send and receive email  
9 starting in or about November 2012 and continuing through the end of April 2014 and  
10 thereafter.

11                   679) Plaintiff Audrey Wittrup resides in Virginia, had a GAFE account  
12 through the University of Michigan, and used it to send and receive email starting in or  
13 about October 2012 and continuing through the end of April 2014 and thereafter.

14                   680) Plaintiff Myles Woerner resides in Illinois, had a GAFE account  
15 through the University of Michigan, and used it to send and receive email starting in or  
16 about October 2012 and continuing through June 2013.

17                   681) Plaintiff Sam Wolfe resides in Georgia, had a GAFE account  
18 through Virginia Tech, and used it to send and receive email starting in or about  
19 December 2012 and continuing through the end of April 2014 and thereafter.

20                   682) Plaintiff Max Wolff resides in Michigan, had a GAFE account  
21 through the University of Michigan, and used it to send and receive email starting in or  
22 about October 2012 and continuing through the end of April 2014 and thereafter.

23                   683) Plaintiff Nicole Wonderly resides in Washington, had a GAFE  
24 account through Pacific Lutheran University, and used it to send and receive email  
25 starting in or about July 2009 and continuing through May 2011.  
26  
27  
28

1                   684) Plaintiff Amanda Wong resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about November 2011 and continuing through March 2011.

4                   685) Plaintiff Amanda Wood resides in California, had a GAFE account  
5 through the University of California, Santa Cruz, and used it to send and receive email  
6 starting in or about November 2011 and continuing through June 2012.

7                   686) Plaintiff Jessicah Wood resides in California, had a GAFE account  
8 through the University of California, Santa Cruz, and used it to send and receive email  
9 starting in or about September 2012 and continuing through the end of April 2014 and  
10 thereafter.

11                   687) Plaintiff Brendan Woodruff resides in California, had a GAFE  
12 account through the University of California, Santa Cruz, and used it to send and receive  
13 email starting in or about November 2011 and continuing through December 2011.

14                   688) Plaintiff Joshua Wright resides in New York, had a GAFE account  
15 through Boston University, and used it to send and receive email starting in or about  
16 September 2011 and continuing through May 2012.

17                   689) Plaintiff Samantha Wright resides in California, had a GAFE  
18 account through the University of California, Santa Cruz, and used it to send and receive  
19 email starting in or about May 2012 and continuing through the end of April 2014 and  
20 thereafter.

21                   690) Plaintiff Selisa Wright resides in Hawaii, had a GAFE account  
22 through the University of Hawaii, and used it to send and receive email starting in or  
23 about December 2011 and continuing through the end of April 2014 and thereafter.

24                   691) Plaintiff Jacob Wunsh resides in Colorado, had a GAFE account  
25 through Northwestern University, and used it to send and receive email starting in or  
26 about September 2010 and continuing through the end of April 2014 and thereafter.  
27  
28

1                   692) Plaintiff Alexander Yaldo resides in Michigan, had a GAFE  
2 account through the University of Michigan, and used it to send and receive email starting  
3 in or about October 2012 and continuing through the end of April 2014 and thereafter.

4                   693) Plaintiff Chuqiao Yang resides in Illinois, had a GAFE account  
5 through Northwestern University, and used it to send and receive email starting in or  
6 about September 2013 and continuing through the end of April 2014 and thereafter.

7                   694) Plaintiff Camryn Yaros resides in California, had a GAFE account  
8 through the University of California, Santa Cruz, and used it to send and receive email  
9 starting in or about November 2011 and continuing through the end of April 2014 and  
10 thereafter.

11                   695) Plaintiff Cynthia Yip resides in California, had a GAFE account  
12 through the University of California, Santa Cruz, and used it to send and receive email  
13 starting in or about September 2012 and continuing through the end of April 2014 and  
14 thereafter.

15                   696) Plaintiff Alyssa Young resides in California, had a GAFE account  
16 through the University of California, Santa Cruz, and used it to send and receive email  
17 starting in or about November 2011 and continuing through June 2013.

18                   697) Plaintiff Hope Young resides in Hawaii, had a GAFE account  
19 through the University of Hawaii, and used it to send and receive email starting in or  
20 about December 2011 and continuing through the end of April 2014 and thereafter.

21                   698) Plaintiff Peter Young resides in Massachusetts, had a GAFE  
22 account through the Rhode Island School of Design, and used it to send and receive email  
23 starting in or about January 2011 and continuing through the end of April 2014 and  
24 thereafter.

25                   699) Plaintiff Allyn Yu resides in New York, had a GAFE account  
26 through the Rhode Island School of Design, and used it to send and receive email starting  
27 in or about January 2011 and continuing through June 2011.  
28

1                   700) Plaintiff Gordon Yu resides in California, had a GAFE account  
2 through the University of California, Santa Cruz, and used it to send and receive email  
3 starting in or about September 2012 and continuing through the end of April 2014 and  
4 thereafter.

5                   701) Plaintiff Christina Yun resides in California, had a GAFE account  
6 through the University of California, Berkeley, and used it to send and receive email  
7 starting in or about November 2012 and continuing through the end of April 2014 and  
8 thereafter.

9                   702) Plaintiff Sierra Zang resides in Maine, had a GAFE account through  
10 the University of Maine, and used it to send and receive email starting in or about  
11 September 2010 and continuing through the end of April 2014 and thereafter.

12                   703) Plaintiff Cory Zapatka resides in New York, had a GAFE account  
13 through the Rhode Island School of Design, and used it to send and receive email starting  
14 in or about January 2011 and continuing through June 2012.

15                   704) Plaintiff Natasha Zaretsky resides in California, had a GAFE  
16 account through the University of California, Santa Cruz, and used it to send and receive  
17 email starting in or about August 2012 and continuing through the end of April 2014 and  
18 thereafter.

19                   705) Plaintiff Nicholas Zessis resides in Illinois, had a GAFE account  
20 through Northwestern University, and used it to send and receive email starting in or  
21 about September 2008 and continuing through July 2012.

22                   706) Plaintiff Mo Zhang resides in New Jersey, had a GAFE account  
23 through the University of Michigan, and used it to send and receive email starting in or  
24 about October 2012 and continuing through December 2013.

25                   707) Plaintiff Kevin Zhu resides in California, had a GAFE account  
26 through the University of California, Berkeley, and used it to send and receive email  
27 starting in or about November 2012 and continuing through May 2013.  
28

708) Plaintiff Amy Zimmerman resides in California, had a GAFE account through the University of California, Santa Cruz, and used it to send and receive email starting in or about November 2011 and continuing through the end of April 2014 and thereafter.

709) Plaintiff Gregory Zoeller resides in Massachusetts, had a GAFE account through Boston University, and used it to send and receive email starting in or about September 2011 and continuing through May 2012.

710) Plaintiff Steven Zwick resides in Massachusetts, had a GAFE account through Yale University, and used it to send and receive email starting in or about October 2012 and continuing through the end of April 2014 and thereafter.

18. No Plaintiff authorized Google to intercept, read, or create a user profile on him or her from the contents of, his or her Google Apps for Education email for Commercial Purposes, or otherwise to intercept and analyze his or her email content for Google's economic advantage. To the contrary, each Plaintiff was at all relevant times ignorant of Google's wrongdoing. Until April 30, 2014, Google denied that it was scanning Google Apps for Education users' emails for advertising or other Commercial Purposes and misled Educational Institutions into believing their users' emails were private. Google's lies included—without limitation—the following false statements:

1) From at least March 29, 2011 to at least August 21, 2013, in the Google Apps Help section of Google's website, on its Security and Privacy FAQ page, Google stated: "If you are using Google Apps (free edition), email is scanned so we can display contextually relevant advertising in some circumstances. *Note that there is no ad-related scanning or processing in Google Apps for Education or Business with ads disabled.*"<sup>1</sup>

2) From at least June 18, 2011 to at least September 9, 2012 Google's Google Apps for Education, Security & Privacy Overview webpage stated:

---

<sup>1</sup> See <http://support.google.com/a/bin/answer.py?hl=en&answer=60762> available at web.archive.org. (emphasis added.)



**A technology platform schools can trust**

Our business is built on your trust. We recognize that schools expect us to properly secure their data and respect the privacy of their information.

[...]

**No advertising to students, faculty or staff**

“We offer Google Apps for Education to schools for free. It's also completely ad-free—which means *your school's content is not processed by Google's advertising systems.*”<sup>2</sup>

19. Google lied to GAFE users’ respective Educational Institutions and each of them, and made public statements that concealed its true intentions and the programmatic actions of its systems and services. Google thereby misled Educational Institutions (and, at least indirectly, Educational users, including Plaintiffs) into using those services. By these fraudulent and deceptive means and devices, and under these false pretenses, Google invaded the privacy of Plaintiffs, and each of them, and stole, converted, misappropriated, and otherwise took and obtained Plaintiffs’ private and sensitive information, some of which information was and is protected from disclosure or misuse by applicable state and/or federal laws or regulations, including but not limited to FERPA.

20. Educational Institutions that provided Google Apps for Education services to their affiliated Educational Users agreed, in their contracts with Google, to obtain authorization from end users for Google to provide the services—*but not for Google to intercept and scan Educational Users’ emails for Commercial Purposes*. Google did not mandate how these Educational Institutions obtained these authorizations, and the disclosures and authorizations regarding GAFE naturally varied by school. Plaintiffs are informed and believe that Google routinely promised Educational Institutions that the

<sup>2</sup> See <http://www.google.com/apps/intl/en/edu/privacy.html> available at web.archive.org. (bold in original, italics added.)

1 contract between Google and the school took precedence over any contradictory terms in  
2 Google's GAFE-specific or general Terms of Use and Privacy Policies.

3         21. When users were setting up their individual GAFE accounts, or had  
4 questions about applicable terms, conditions, or policies, many Educational Institutions  
5 directed students to the school's own privacy or use policies, some to Terms of Use  
6 specifically agreed-upon by the Educational Institution and Google, others to the Google  
7 Apps For Education Terms of Service and/or Privacy Policy, yet others to the general  
8 Google Terms of Service and/or Privacy Policies. Some schools directly told their users,  
9 consistent with public statements by Google, that Google Apps for Education would not  
10 scan their emails for Commercial Purposes. Most Plaintiffs' Educational Institutions  
11 were in this final category.

12         22. No Plaintiff's Educational Institution's disclosures put any Educational  
13 User on notice that its users' GAFE emails would be intercepted and scanned by Google  
14 for Commercial Purposes. On information and belief, each Plaintiff's Educational  
15 Institution had disabled ads within its GAFE account and reasonably understood—based  
16 on Google's public statements, Google's private assurances, and/or that institution's  
17 contract with Google—that its users' GAFE email accounts were safe from Google's  
18 commercial or advertising-related interception and scanning activities. Plaintiffs and each  
19 of them therefore did not know of, consent to, or receive notice of Google's true  
20 intentions and actions.

21         23. Through the investigation of counsel, Plaintiffs have identified many  
22 Educational Institutions that expressly assured their Educational Users that Google would  
23 respect users' privacy and would not scan users' emails for advertising or Commercial  
24 Purposes. Plaintiffs further have identified many more schools whose disclosures plainly  
25 did not give users anything resembling notice of Google's interception and scanning of  
26 their GAFE emails for advertising or other Commercial Purposes. Plaintiffs' Educational  
27  
28

Institutions' statements to users include, by way of example only and without limitation, the following:

1) University of California, Berkeley

i. UC Berkeley's FAQ's page said:

**How does privacy protection for bConnected differ from consumer level Google services?**

Berkeley's contract with Google put in place stronger protective measures around data stored and transmitted in the UC Berkeley implementation of the Google Apps core services (see above for which of the core Google services are available in bConnected: "What services are included in bConnected, the UC Berkeley Google Apps for Education suite?").

- Data stored in core services are not scanned for the purpose of displaying ads.
- Data stored in core services are also not accessible by non-core services.
- The same access restriction to data in core services applies to third party sites where Google is serving ads.

In consumer-level Google services, data is not protected from being shared between any of the services offered, such as between Google Calendar and Google Search. Using bConnected core services protects data. An example of this protection would be if you log into your bConnected account, then proceed to Google Search to look for something. Ads displaying in Google Search results screen (a non-core service) will not be influenced by data in your bMail or bCal (data in a core service). You can use non-core services from your bConnected account knowing your data is protected.<sup>3</sup>

2) University of California, Santa Cruz

i. UC Santa Cruz's "Security Information for Google Apps"

said:

**Google Privacy Policy and Terms of Service**

The [University of California has a contract with Google](http://bconnected.berkeley.edu/faq-page#t30n332) that provides assurances regarding the security and privacy of customer information stored on Google's systems. UC's contract with Google

<sup>3</sup> See <http://bconnected.berkeley.edu/faq-page#t30n332> available at web.archive.org. (emphasis in original.)

1 takes precedence if there is a conflict with Google's posted terms or  
2 policies.

3 [...]

4 MYTH: Google accesses people's email for marketing purposes.

5 FACT: Google Apps for Education is ad-free for students, faculty,  
6 and staff. This means that your email is not processed by Google's  
7 advertising systems."<sup>4</sup>

8 3) San Diego State University

9 i. San Diego State University's "Frequently Asked  
10 Questions" said:

11 **Q. Will SDSU still "own" and control the email and calendar**  
12 **data when we move to Google?**

13 **A.** Yes. Under our agreement, SDSU will continue to control the  
14 email data stored at Google. Enterprise Technology Services (ETS)  
15 will create and manage the email accounts, including password resets.  
16 In addition, Google will not scan the email or calendar data for  
17 advertising purposes.<sup>5</sup>

18 4) Harvard University

19 i. Harvard University's "FAQs" said:

20 Google Apps for Harvard has the following benefits:

- 21 • Data stored within Google Apps for Harvard will be protected  
22 under the Harvard-Google contract, meaning that Google will  
23 adhere to Harvard's compliance practices with FERPA and  
24 DMCA laws, will not advertise to users, and will not use user data  
25 for purposes other than maintaining the Google Apps for Harvard  
26 service.
- 27 • You will easily be able to look up other Google Apps for Harvard  
28 users within the Google Apps directory.
- You can receive IT support and advice from HUIT.<sup>6</sup>

<sup>4</sup> See <http://its.ucsc.edu/google/security.html> available at web.archive.org.

<sup>5</sup> See <http://ets.sdsu.edu/helpdesk/faqs.htm#gen4> available at web.archive.org.

<sup>6</sup> See <http://g.harvard.edu/faqs> available at web.archive.org.

1  
2 5) Yale University

3 i. Yale University's "Data Security & Privacy" page said:

4 Will Google safeguard individual privacy of our email and data?

5 Yes, Google will safeguard individual privacy of our email and data.  
6 In addition to the standard privacy practices that Google offers to all  
7 its users, Yale also has a signed contract with Google that guarantees  
8 privacy and confidentiality in ways that are analogous to the way  
9 Yale currently provides email services.

10 What does Google intend to do with the data, in addition to providing  
11 the contracted services?

12 Google asserts that Yale will retain possession of EliApps data. "Data  
13 mining" and vending ads are NOT part of the service package for  
14 EliApps accounts.<sup>7</sup>

15 6) University of Arizona

16 i. The University of Arizona's "Student Email" page said:

17 Student email provided by Google offers numerous benefits:

- 18
- 19 • over 7 GB of storage space
  - 20 • access via web, preferred POP or IMAP email client, or mobile  
21 device
  - 22 • email organized with Google's outstanding search tools
  - 23 • Google's excellent security and uptime record
  - 24 • educational contract, which means no ads and full privacy  
25 protection for your content<sup>8</sup>

26 ii. The University of Arizona's CatMail FAQ said:

27 Does CatMail sync with or replace my existing Google Mail account?

28 Your CatMail account is totally separate from regular Google and any  
account you may have there. CatMail allows you to send and receive

---

<sup>7</sup> See <http://its.yale.edu/services/email-and-calendars/eliapps-google-apps-education/eliapps-faq> available at web.archive.org.

<sup>8</sup> See <http://uits.arizona.edu/services/catmail/> available at web.archive.org.

1 email with all the Google tools using your @email.arizona.edu  
2 address—plus full privacy of your information and no ads!<sup>9</sup>

3 7) University of Maine

4 i. The University of Maine’s “Google Apps Frequently  
5 Asked Questions” page said:

6 Will Google search our email for marketing purposes?

7 No. The educational agreement prohibits that activity.<sup>10</sup>

8  
9 8) State University of New York at Stony Brook

10 i. SUNY Stony Brook’s “Making the move to Google Apps  
11 for Education” presentation said:

12 **Privacy Concerns**

- 13 • Google Apps is governed by a detailed Privacy Policy,  
14 (SUNY-wide contract) that ensures Google **will not** share or  
15 use personal information placed in its systems
- 16 • Google Apps Terms of Service contractually ensures that  
17 Stony Brook is the sole owner of its data
- 18 • There are no advertisements in Google Apps for Education
- 19 • Google is contractually forbidden from scanning content.  
20 Data is scanned for spam, virus protection, malware detection  
and to enable powerful search capability.<sup>11</sup>

21 9) University of Washington

22 i. The University of Washington’s “UW Google Apps FAQs”  
23 page said:

24 “UW Google Apps accounts do not contain targeted advertising and  
25 are not scanned for advertising purposes.”<sup>12,</sup>

26 <sup>9</sup> See [http://uits.arizona.edu/faq/catmail/does-catmail-sync-or-replace-my-existing-](http://uits.arizona.edu/faq/catmail/does-catmail-sync-or-replace-my-existing-google-mail-account)  
27 [google-mail-account](http://uits.arizona.edu/faq/catmail/does-catmail-sync-or-replace-my-existing-google-mail-account) available at web.archive.org

<sup>10</sup> See <http://mail.maine.edu/google/faq.html#a6> available at web.archive.org.

28 <sup>11</sup> See [http://it.cc.stonybrook.edu/site\\_documents/google/Town\\_Hall\\_presentation.pdf](http://it.cc.stonybrook.edu/site_documents/google/Town_Hall_presentation.pdf)  
available at web.archive.org.

10) Pacific Lutheran University

i. Pacific Lutheran University's "Frequently Asked Questions About Google Apps for EDU@PLU" page said:

**What about privacy? I've heard that Google tracks your emails. Do you have any concerns about this?**

Initially, Google was not the lead option because of our privacy concerns. However, we discovered that we can turn off advertisements and have assurances in our contract that say "each party is going to protect confidential information as if it were its own." The only reason for searching our email would be a legal requirement to do so. That would involve a subpoena and Google would contact PLU prior to any action on their part. We are confident that our privacy concerns have been adequately addressed.<sup>13</sup>

11) Boston University

i. Boston University's "BU Google Apps FAQ" page said:

Is there any relationship between my BU Google Apps account and my commercial Gmail account?

No. These two accounts are completely separate. In fact, it can be best to use separate browsers, or use Google Chrome, when trying to work simultaneously with both BU Google Apps and commercial Gmail.

I'm concerned about the Terms of Service notice that I received when I set up my BU Google Apps account. Can you tell me what it means?

The Terms of Service is a standard message from Google letting you know that your BU Google Apps account differs from a personal Gmail account in that you are subject to the terms and conditions affiliated with Boston University's Computing Ethics and other Policies. These terms and conditions are the same as those you were subject to when using an ACS account, or any other account hosted on a BU server.<sup>14</sup>

ii. Boston University's Educational Technology Blog said in a post entitled "Google Apps Available for Educational Use":

---

<sup>12</sup> See [http://www.washington.edu/itconnect/connect/email/google-apps/uw-google-apps-faqs#ga\\_data](http://www.washington.edu/itconnect/connect/email/google-apps/uw-google-apps-faqs#ga_data) available at web.archive.org.

<sup>13</sup> See <http://www.plu.edu/google-apps/faq/home.php> available at web.archive.org.

<sup>14</sup> See <http://www.bu.edu/tech/accounts/email/google/faq/> available at web.archive.org.

Because BU has a service agreement with Google, comments and grades on student papers can be provided in BU Google Apps without violating FERPA policy. (Commenting on student work through unsupported third-party services, like Dropbox, is usually illegal under FERPA.) To make sure you stay within FERPA guidelines, we highly recommend that you create a BU Google account to use Google Apps for educational purposes (rather than a personal Google/Gmail account). To create one, go to our account creation page and follow the instructions. You can log into this account by entering your BU email address as a username and not entering a password; Google will redirect you to the regular BU Kerberos login screen.<sup>15</sup>

12) New York University

i. New York University's Terms of Use for NYU Google

Apps for Education page said:

NYU Google Apps for Education is a set of communications and collaboration applications hosted by Google Inc. on behalf of New York University. NYU Google Apps for Education is offered by Google to NYU in accordance with a specially negotiated end-user license agreement designed to protect the privacy and security of information owned by New York University and the members of its community, guaranteeing that Google will not access or reuse information stored in these applications for its own, commercial purposes.<sup>16</sup>

ii. New York University's Q&A Regarding Google's Privacy

Policy page said:

**Can Google use the information in my NYU Google Email account, directly or indirectly, for any commercial purpose?**

**No.** Under NYU's contract with Google, Google cannot use information or data within the NYU Google Core Applications, directly or indirectly, for marketing or for serving you online advertisements, or for any other commercial purpose. The only use which Google can make of data or information contained within your Core Applications is to maximize the personal search capabilities of your own account. This allows for the

<sup>15</sup> See <http://sites.bu.edu/edtech/2013/01/30/google-apps-available-for-educational-use/>.

<sup>16</sup> See <http://www.nyu.edu/about/news-publications/publications/connect-information-technology/2011/12/14/guidance-for-privacy-and-security-in-nyu-google-apps-for-education.advancedsearch.html?types=article>



1 unusually fast Gmail searching capabilities within NYU Google Email  
2 accounts that we experience.<sup>17</sup>

3 13) University of Hawaii

4 i. The University of Hawaii's Google@UH Frequently Asked  
5 Questions page said:

6 **Will Google be reading our email?**

7 Google has committed that user content is only scanned or indexed in the  
8 following cases to provide specific services:

- 9
- 10 • Some user data, such as email messages and documents, are scanned and  
11 indexed to enable fast search for information by an individual within  
12 their own Google Apps accounts. (Most users find that lightening fast  
13 searching of large email archives is immensely useful.)
  - 14 • Email is scanned to perform spam filtering and virus detection, as UH  
15 does now.
  - 16 • Google does not scan or index data for any other purposes. All scanning  
17 and indexing procedures are automated and involve no human  
18 interaction.
  - 19 • Except when users choose to publish their information publicly, Google  
20 Apps data is not publicly searchable. Information scanned as described  
21 above is not shared with third parties.<sup>18</sup>

22 14) University of Michigan

23 i. The University of Michigan's Security and Privacy in the  
24 M+Google Environment page said:

25 **Will Google mine my data for their own purposes? Is U-M going  
26 to sell my data to Google?**

27 Per the terms of our agreement (which covers Core Services only),  
28 Google may only process or otherwise use M+Google account data as  
required for the purpose of providing services and performing its  
obligations under the agreement. This includes processes for  
preventing spam and ensuring the technical functioning of Google's  
network (including detecting, preventing or otherwise addressing  
fraud, security or technical issues). Note that our agreement with

<sup>17</sup> See [https://nyu.service-now.com/servicelink/kb\\_view.do?sys\\_kb\\_id=0a8bfb167449810075e62ca050042e48&sysparm\\_nameofstack=5703ebbd0ff5da044d20348ce1050ed7&sysparm\\_clear\\_stack=yes](https://nyu.service-now.com/servicelink/kb_view.do?sys_kb_id=0a8bfb167449810075e62ca050042e48&sysparm_nameofstack=5703ebbd0ff5da044d20348ce1050ed7&sysparm_clear_stack=yes)

<sup>18</sup> See <http://www.hawaii.edu/google/faq.html> available at web.archive.org.

Google specifically prohibits advertising within the U-M domain for the Core Services. The university is neither selling data nor profiting from this arrangement.<sup>19</sup>

15) Michigan Technological University

i. Michigan Tech's Going Google Frequently Asked

Questions page said:

Will Google mine our data for their own purposes? Is Michigan Tech going to sell our data to Google?

No. Per the terms of our agreement, Google may only process or otherwise use Michigan Tech account data as required for the purpose of providing services and performing its obligations under the agreement. This includes processes for preventing spam and ensuring the technical functioning of Google's network (including detecting, preventing or otherwise addressing fraud, security or technical issues). Note that our agreement with Google specifically prohibits advertising within the Michigan Tech Google Apps for Education domain. The university is neither selling data nor profiting from this arrangement.<sup>20</sup>

16) Northwestern University

i. Northwestern's Google Partnership website said:

**Impact on End User**

Northwestern's partnership with Google will bring the following services to students:

- E-mail: Gmail with over 2 gigabytes of storage
- Calendar: Standard Google calendar system
- Google Talk: Instant messaging and Google to Google voice service
- Google Docs: Convenient online document sharing
- Security: Student data will not be shared or used for marketing purposes
- Personalization: When activating the service, students will be given a choice of account names to choose from and will have the option to set up additional aliases if desired.<sup>21</sup>

<sup>19</sup> See <http://safecomputing.umich.edu/protect-um-data/google.php> available at web.archive.org

<sup>20</sup> See <http://goinggoogle.mtu.edu/faq> available at web.archive.org.

<sup>21</sup> See <http://www.it.northwestern.edu/transitions/google.html> available at web.archive.org.

17) University of Connecticut

i. During its GAFE roll-out, The University of Connecticut's Office of University Communications webpage said, in an article entitled "Sick of HuskyMail? Opt-in to UConn Email Through Google":

UConn students can now abandon the unpopular HuskyMail system and opt-in to get all their UConn email and other apps through Google by visiting <http://google.uconn.edu>. Students must opt-in, as the switchover will not happen automatically.

[...]

According to UITs, the University will have "ownership" of the data, ensuring that the privacy of students will be protected and that Google will not be able to conduct "data mining" on student accounts. Ads also will not appear.<sup>22</sup>

ii. The University of Connecticut's Office of University Communications webpage said, in an article entitled "Still time to switch from HuskyMail to UConn Email Through Google":

Following the University's switch from the unpopular and outmoded HuskyMail to a new student email system through Google, more than 12,000 undergraduate and graduate students have already moved to the new system. [...]

In addition to getting all UConn email through Google, students will also have access to Google's document sharing, calendar, chat, and voice-dialing apps.

Two of the most commonly heard complaints about the HuskyMail system were that there wasn't enough storage capacity (50 megabytes) and the web interface was antiquated. Using Google solves both, by providing 25 gigabytes of storage and a modern interface.

According to UITs, the University has "ownership" of the data, ensuring that the privacy of students will be protected and that Google will not be able to conduct "data mining" on student accounts. Ads also will not appear.<sup>23</sup>

---

<sup>22</sup> See <http://today.uconn.edu/2011/09/sick-of-huskymail-opt-in-to-uconn-email-through-google/>.

<sup>23</sup> See <http://today.uconn.edu/2011/10/still-time-to-switch-from-huskymail-to-uconn-email-through-google/>.

iii. The University of Connecticut's Google Apps @ UConn

page said:

Why are certain Google Apps not working for me using my UConn account?

Core Services are enabled by default when students are given their UConn Google Apps account. These services are protected under university contract and cannot be data mined by any Google service. This means that anything outside of the 6 main services (Gmail, Calendar, Drive, Hangouts, Sites, Groups) may not work when signed in with your account. If you would like full access to all the applications that Google offers then you may opt-in to Google Apps Public Services. Please note that Public Services does not fall under the same contract and you have to agree to a different user level agreement when you opt-in.<sup>24</sup>

18) Virginia Tech

i. Virginia Tech's Going Google Frequently Asked Questions

page said:

**Will Google mine our data for their own purposes? Is Virginia Tech going to sell our data to Google?**

No. Per the terms of our agreement, Google may only process or otherwise use Virginia Tech account data as required for the purpose of providing services and performing its obligations under the agreement. This includes processes for preventing spam and ensuring the technical functioning of Google's network (including detecting, preventing or otherwise addressing fraud, security, or technical issues). Note that our agreement with Google specifically prohibits advertising within the Virginia Tech Google Apps for Education domain. The university is neither selling data nor profiting from this arrangement.<sup>25</sup>

24. Based on the foregoing, Plaintiffs are informed and believe that, in addition to assuring these and other Educational Institutions that Google would not scan emails for Commercial Purposes, Google specifically, both contractually and otherwise promised that it would not do so in response to Educational Institutions' express efforts to safeguard their respective Educational Users' privacy and for those users' express and

<sup>24</sup> See <http://g.uconn.edu/student-uses-features/> available at web.archive.org.

<sup>25</sup> See <http://going.google.vt.edu/frequently-asked-questions#usingmail7> available at web.archive.org.

1 intended benefit. Plaintiffs, and each of them were intended third party beneficiaries of  
2 these covenants, which were false promises when made in that Google never intended to  
3 honor them. Google at all relevant times instead intended to intercept, scan, and process  
4 the content of users' emails for Commercial Purposes. Google's scanning therefore  
5 defrauded Educational Institutions, breached its express written agreements with  
6 Educational Institutions, and breached corresponding duties owed to Educational Users,  
7 including Plaintiffs and each of them, and damaging them by causing the unconsented  
8 and unknowing loss of privacy and of private information. Google's actions further  
9 violated applicable consumer protection statutes and regulations, educational statutes and  
10 regulations, and other applicable laws and were misleading, unfair, and fraudulent.

11 25. Google at all relevant times knew that all relevant Educational Institutions  
12 were concerned about privacy. In 2004, Google launched a campus pilot of its Gmail  
13 service. This early version of GAFE contained the same advertising that existed in Gmail  
14 at the time. GAFE initially was offered with the same types of advertising as regular  
15 Gmail accounts. This was expressly rejected by many schools. Google then offered  
16 GAFE with advertising disabled for student accounts (only). In the face of continued  
17 resistance, in October of 2007 Google began offering GAFE without any advertising.<sup>26</sup>

18 26. Google would negotiate still more privacy-friendly terms when it was  
19 further pressed by schools considering GAFE. When questioned about student privacy in  
20 2010, Google's Jeff Keltner, Business Development Manager for Google Apps for  
21 Education, stated "We've really tackled the privacy issues contractually" and that Google  
22 had "tried to push the limits in terms of protecting our users' data, protecting our users'  
23 privacy."<sup>27</sup> Plaintiffs are informed and believe that each GAFE contract assured the  
24 relevant Educational Institution, for its benefit and that of its Educational Users,  
25

26 <sup>26</sup> See "Jeff Keltner speaks at Google@school." Youtube (October 4, 2007) available at  
27 <https://www.youtube.com/watch?v=UpMGcdjshng>.

28 <sup>27</sup> See "UC Davis Faculty Snub Gmail Over Privacy." WebPro News (May 5, 2010)  
available at <http://www.webpronews.com/uc-davis-faculty-snub-gmail-over-privacy-2010-05/>.

1 including Plaintiffs and each of them, that Google would not engage in the scanning of  
2 users' GAFE emails for Commercial Purposes.

3 27. On March 18, 2014, in *In re Google Inc. Gmail Litigation*, No. 13-MD-  
4 2430-LHK, 2014 WL 1102660, at \*15 (N.D. Cal. Mar. 18, 2014) ("*Gmail*"), U.S. District  
5 Court Judge Lucy Koh declined to certify a Privacy Act claim brought by a proposed  
6 class of virtually all Google Apps for Education email users<sup>28</sup> because "the diversity of  
7 disclosures made by educational institutions, ranging from specific disclosures about the  
8 method and reasons for interceptions to the incorporation of vague disclosures, may well  
9 lead a fact-finder to conclude that end users at some universities consented, while end  
10 users at other universities did not." Google had identified a small number of Educational  
11 Institutions that made disclosures potentially sufficient to put their users on notice of  
12 Google's email interception and content scanning, and thus defeated class certification  
13 given the broad proposed class definition.

14 28. The universal class of Google Apps for Education users in the *Gmail*  
15 matter originated with *Robert Fread and Rafael Carillo v. Google Inc.*, No. CV-13-  
16 01961-HRL, filed in the Northern District of California, San Jose Division on April 29,  
17 2013. The class was defined in that complaint as "All Google Apps for Education users  
18 who, through their Google Apps for Education email account, have Sent or Received  
19 email messages up through and including the date of class certification."<sup>29</sup> A slightly  
20 narrower class definition was included in the Plaintiffs' Consolidated Individual and  
21 Class Action Complaint, filed in the *Gmail* multi-district litigation on May 23, 2013.<sup>30</sup>  
22

---

23 <sup>28</sup> That proposed class was defined as "All Google Apps for Education Users who have,  
24 through their Google Apps for Education email accounts, sent an email message to a  
25 Gmail account user with a "@gmail.com" address or have received an email. *In re*  
*Google Inc. Gmail Litig.*, 2014 WL 1102660, at \*10.

26 <sup>29</sup> Complaint available online at  
<http://digitalcommons.law.scu.edu/cgi/viewcontent.cgi?article=1366&context=historical>.

27 <sup>30</sup> That complaint defined the class as: "All Google Apps for Education Users who have,  
28 through their Google Apps for Education email accounts, (1) sent an email message to a  
Gmail account user with an @gmail.com address and received a reply, or (2) received an  
email message, within two years before the filing of this action up through and including  
the date of class certification." *Gmail* complaint at ¶ 387.

1           29. Plaintiffs here, and each of them, fall within the group of Educational  
2 Users who did not consent. Each had and used to send and receive emails, within the  
3 Relevant Period, a Google Apps for Education account from an Educational Institution  
4 that: (a) specifically told end users that their school-provided GAFE account emails  
5 would not be scanned for Commercial Purposes, (b) led users to believe that their  
6 school's policies and/or applicable laws such as FERPA governed access to users' email  
7 accounts (which Policies made no provision for third party interception or scanning for  
8 Commercial Purposes, nevermind commercial use of email content), and/or (c) otherwise  
9 failed to provide anything resembling notice that Google would be intercepting,  
10 scanning, and using the content of users' emails for its own Commercial Purposes.

11           30. Consistent with Google's public pronouncements (quoted above), and  
12 with and any and all private assurances provided by Google's agents, these schools and  
13 Plaintiffs and each of them reasonably did not know, understand, or suspect that Google  
14 was secretly intercepting and reading their emails for Commercial Purposes.

15           31. Further, for years, neither Google nor the press disclosed that Google was  
16 scanning Plaintiffs' emails for Commercial Purposes. End users, including Plaintiffs and  
17 each of them, therefore reasonably first learned of Google's Privacy Act violations well  
18 within the applicable statutory limitations period, most of them in 2016.

19           32. In March of 2014, following the denial of class certification by Judge  
20 Koh, some Educational Institutions first learned that Google was scanning Educational  
21 Users' emails for Commercial Purposes despite Google's representations and covenants  
22 to the contrary. Some of these institutions pressured Google to stop. In response, on April  
23 30, 2014, Google posted an announcement on its Google for Work blog—which (as  
24 Google knows) the vast majority of users do not read or even know exists. Google chose  
25 to avoid obviously superior methods of notice, including but not limited to email.

26           33. That carefully-crafted post, entitled "Protecting Students with Google  
27 Apps for Education," was incomprehensible, at least on the relevant points. It touted  
28



1 Google's dedication to the privacy and security of GAFE end users. Buried in the middle,  
2 Google claimed it was "taking additional steps" to "enhance the educational experience"  
3 of GAFE end users by having now "permanently removed all ads scanning in Gmail for  
4 Apps for Education, which means Google cannot collect or use student data in Apps for  
5 Education services for advertising purposes."

6 34. Google's vague, flowery, and self-serving language was intended to  
7 ensure and ensured that concerned Educational Institutions would be reassured that there  
8 would be no future ad scanning, while GAFE users who read the announcement still  
9 would not understand or suspect that Google had been systematically and illegally  
10 intercepting their emails and scanning their emails' content for Commercial Purposes.

11 35. Google has refused to release additional details that would confirm its  
12 indirect admission that it has stopped collecting or using student data (or information  
13 derived from analysis of student data) for Commercial Purposes; furthermore, Google  
14 has refused to delete previously-collected data and has refused to promise not to use  
15 previously-collected data for Commercial Purposes.

16 36. Plaintiffs are informed and believe that Google has retained and uses or  
17 intends to use all data created or otherwise obtained from its interception of emails sent  
18 or received by Plaintiffs for Commercial Purposes.

19 37. Plaintiffs' emails were and are valuable intangible property protected by  
20 applicable law. Markets exist for the sale or purchase of this information. While data  
21 brokers have been buying and selling this type of information throughout the relevant  
22 timeframe, grey and black markets have become more common.<sup>31</sup> Data marketplaces  
23 have also arisen in the last decade, broadening the trade in user content.<sup>32</sup> Big data, which  
24 feeds on such information as a raw material, is expected to top \$48.6 billion in sales by  
25

26 <sup>31</sup> See, e.g., "How much is your identity worth?" Krebs on Security (November 8, 2011)  
27 available at <http://krebsonsecurity.com/2011/11/how-much-is-your-identity-worth/>;  
Indictment of Hieu Minh Ngo, Case No. 1:12-cr-00144-PB (November 2012) available at  
28 <http://krebsonsecurity.com/wp-content/uploads/2013/10/NgoIndictment.pdf>.

<sup>32</sup> See, e.g., "The User Data Exchange" available at <https://big.exchange/>; "BDEX"  
available at <http://www.bigdataexchange.com/>.



2019.<sup>33</sup> “Infomediaries” have also been coming back into vogue, allowing individual users to sell their data directly to advertisers.<sup>34</sup>

38. On information and belief, Google derives significant economic benefit from its use of its email users’ intangible property, including Plaintiffs’. For example, without limitation, Google uses email content to more accurately target its advertising. “The more narrowly and accurately Google can target an ad to a user to match her interests, the more it can charge advertisers for each view or click. Total online ad revenues for all companies, worldwide, topped \$117 billion in 2013, and Google collected a third of that, accruing more than the rest of the top 10 companies in online ad revenue combined. That dominance is a result of Google’s knowledge of what we do online.”<sup>35</sup>

39. Google “maximizes the effectiveness of its ads, and therefore its revenue, by collecting information about its users so that it can match ads to individual users’ interests and activities.”<sup>36</sup>

40. On information and belief, Google derives the above-described benefits, and others, from its use of information derived from its unauthorized and therefore illegal interception, scanning, and processing of Plaintiffs’ GAFE emails. Google has damaged Plaintiffs and each of them and been unjustly enriched in the process of, among other things, violating Plaintiffs’ property rights in their emails, invading Plaintiffs’ privacy, violating Plaintiffs’ rights as third party beneficiaries of Google’s agreements with

<sup>33</sup> “IDC says big data spending to hit \$48.6 billion in 2019.” CIO (November 11, 2015) available at <http://www.cio.com/article/3004512/big-data/idc-predicts-big-data-spending-to-reach-48-6-billion-in-2019.html>.

<sup>34</sup> See “Privacy or Profit? These Firms Want To Help You Sell Your Data.” NPR (September 9, 2014) available at <http://www.npr.org/2014/09/09/346981606/privacy-or-profit-these-firms-want-to-help-you-sell-your-data>; see also, Handshake, available at <http://handshake.uk.com>; Datacoup, available at <https://datacoup.com/>; and Meeco, available at <https://meeco.me/>.

<sup>35</sup> See “Mission Creep-y: Google is Quietly Becoming One of the Nation’s Most Powerful Political Forces While Expanding Its Information-Collection Empire.” Public Citizen (November 2014) at p10, available at <https://www.citizen.org/documents/Google-Political-Spending-Mission-Creepy.pdf>.

<sup>36</sup> *Id.* at p11.

1 Plaintiffs' respective Educational Institutions, violating Plaintiffs' rights under various  
2 consumer protection statutes, and violating Plaintiffs' rights under or otherwise violating  
3 the Privacy Act.

4 **6. Claims**

5 **COUNT ONE**

6 **(Violations of the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510**  
7 **et seq.)**

8 41. Plaintiffs incorporate the preceding paragraphs of this complaint, and each  
9 of them, as if repeated here.

10 42. Google's acts, as alleged here, have at all times affected interstate  
11 commerce. Google has more than 425 million users worldwide, including numerous  
12 users in all 50 states. On information and belief, during the relevant time frame Google  
13 had more than 30 million GAFE end users, including numerous users in most or all of the  
14 50 United States. Google's services are provided over the internet using servers located  
15 in many states.

16 43. Google, as a corporation, is a "person" within the meaning of 18 U.S.C. §  
17 2510(6).

18 44. The email communications transmitted to and by Plaintiffs and each of  
19 them—that Google intercepted, processed, and used for Commercial Purposes without  
20 consent—were and at all relevant times have been "electronic communications" within  
21 the meaning of 18 U.S.C. § 2510(11).

22 45. Google did as complained of herein without the consent of Plaintiffs, or  
23 any of them.

24 46. Google's actions at all relevant times were intentional as evidenced by,  
25 among other things, the design of its data flow processes, its utilization of message-  
26 scanning devices, its utilization of devices to divine the meaning of the content of private  
27  
28

1 messages and to discern the communicants' likely thoughts before writing them, and  
2 Google's use of that information for, among other things, data profiling and ad targeting.

3 47. Google used one or more "devices," within the meaning of 18 U.S.C. §  
4 2510(5), to intercept the electronic communications transmitted to or by Plaintiffs, and  
5 each of them. These devices include, but are not limited to, the distinct pieces of Google  
6 infrastructure comprising the Content One Box process and Changeling.

7 48. These devices were not used by Google, operating as an electronic  
8 communication service, in the ordinary course of providing electronic communication  
9 services. Google's interception of electronic communications sent by and to Plaintiffs,  
10 and each of them was, among other things: (a) for undisclosed purposes; (b) for purposes  
11 of developing user profiles and otherwise acquiring, cataloging, using, and retaining user  
12 data; (c) for purposes beyond facilitating the transmission of emails sent or received by  
13 Plaintiffs; (d) contrary to Google's public statements; (e) in violation of federal law; and  
14 (f) in violation of the property, contractual, privacy, statutory, and other rights of  
15 Plaintiffs in their private information.

16 49. These activities are not within the ordinary course of business of a  
17 provider of an electronic communication service—particularly one with the motto "don't  
18 be evil"—and are not technologically relevant to providing electronic communications to  
19 users. Instead, these actions involved obtaining and creating detailed information about  
20 the lives of users for unrelated Commercial Purposes, namely, Google's primary  
21 revenue-generating activity of selling highly-targeted advertising to businesses. In the  
22 words of Eric Schmidt, Google's former CEO: "I think of Google as an advertising  
23 company, who [sic] serves the advertising industry."<sup>37</sup>

24  
25  
26  
27 <sup>37</sup> Michael Arrington. "Google CEO Eric Schmidt Interview: His Thoughts on Search,  
28 Books, News, Mobile, Competition and More." Tech Crunch (Aug. 31, 2009) available  
at: <http://techcrunch.com/2009/08/31/google-ceo-eric-schmidt-interview-his-thoughts-on-search-books-news-mobile-competition-and-more/>.

1           50. Schmidt describes Google's goal: "We can suggest what you should do  
2 next, what you care about. Imagine: we know where you are, we know what you like."<sup>38</sup>  
3 This knowledge gives Google "[t]he power of individual targeting—the technology will  
4 be so good that it will be very hard for people to watch or consume something that has  
5 not in some sense been tailored for them."<sup>39</sup> "If we show fewer ads that are more  
6 targeted, those ads are worth more. So we're in this strange situation where we show a  
7 smaller number of ads and we make more money because we show better ads. And that's  
8 the secret of Google."<sup>40</sup>

9           51. Plaintiffs are informed and believe that the conduct alleged herein did not  
10 occur after the electronic communications had finished being transmitted to the end user  
11 or were in end-user-accessible storage. Instead, Google chose to intercept, transfer,  
12 transmit, or route each communication so as to acquire and learn private information  
13 about Plaintiffs from their emails while those emails were still in transit to the end-user—  
14 *i.e.*, even before the addressee of the email received and could see or read it.

15           52. Google's conduct complained of herein violated 18 U.S.C. § 2511(1)(a),  
16 which prohibits the interception or attempted interception of "any wire, oral, or electronic  
17 communication."

18           53. Google's conduct complained of herein violated 18 U.S.C. § 2511(1)(d),  
19 which prohibits the intentional use or attempted use of "contents of any wire, oral, or  
20 electronic communication," when such contents were acquired in violation of 18 U.S.C.  
21 § 2511(1)(a).

22           54. As a direct and proximate result of Google's violations of § 2511, and  
23 pursuant to § 2520, each Plaintiff has suffered actual, direct, and consequential damages  
24

---

25 <sup>38</sup> Alexia Tsotis. "Eric Schmidt: We know where you are, we know what you like." Tech  
26 Crunch (Sep. 7, 2010) available at <http://techcrunch.com/2010/09/07/eric-schmidt-ifa/>.

27 <sup>39</sup> Holman W Jenkins. "Google and the Search for the Future." The Wall Street Journal  
(Aug. 14, 2010) available at <http://www.wsj.com/articles/SB10001424052748704901104575423294099527212>.

28 <sup>40</sup> Jennifer Dauble. "CNBC Exclusive: CNBC's Maria Bartiromo Interviews Google CEO  
Eric Schmidt." CNBC (Apr. 30, 2008) available at <http://www.cnbc.com/id/24386465>.

subject to proof—as valued by, among other things, the loss of the value of his or her own information, and the value of his or her privacy. Further, Google has been unjustly enriched and each Plaintiff has been damaged by the value of that Plaintiff’s own information wrongfully obtained, misappropriated, converted, stolen, and otherwise taken by Google without consent, and any and all revenues and profits Google earned using, selling, or selling the use of that information.

## **7. PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray as follows:

- A. For judgment against Google for Plaintiffs, and each of them;
- B. For a declaration that Google's conduct violated the Privacy Act;
- C. For injunctive relief in the form of, *inter alia*, an order requiring Google to purge all information gathered from the interception of the content of Plaintiffs’ messages in violation of the Privacy Act;
- D. For statutory damages of the greater of \$10,000 or \$100 for each day on which any violation occurred, to each Plaintiff, pursuant to 18 U.S.C. § 2520;
- E. For attorney’s fees pursuant to the common law private attorney general doctrine, California Civil Code section 1021.1, and 18 U.S.C. § 2520(b)(3);
- F. For costs of suit; and
- G. For all such other and further relief as the Court deems just and proper.

Dated: March 16, 2016

Respectfully submitted,

**Gallo LLP**

By: /s/ Ray E. Gallo  
Ray E. Gallo  
*Attorneys for Plaintiffs*

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury of all issues so triable.

Dated: March 16, 2016

Respectfully submitted,

**Gallo LLP**

By: /s/ Ray E. Gallo  
Ray E. Gallo  
*Attorneys for Plaintiffs*